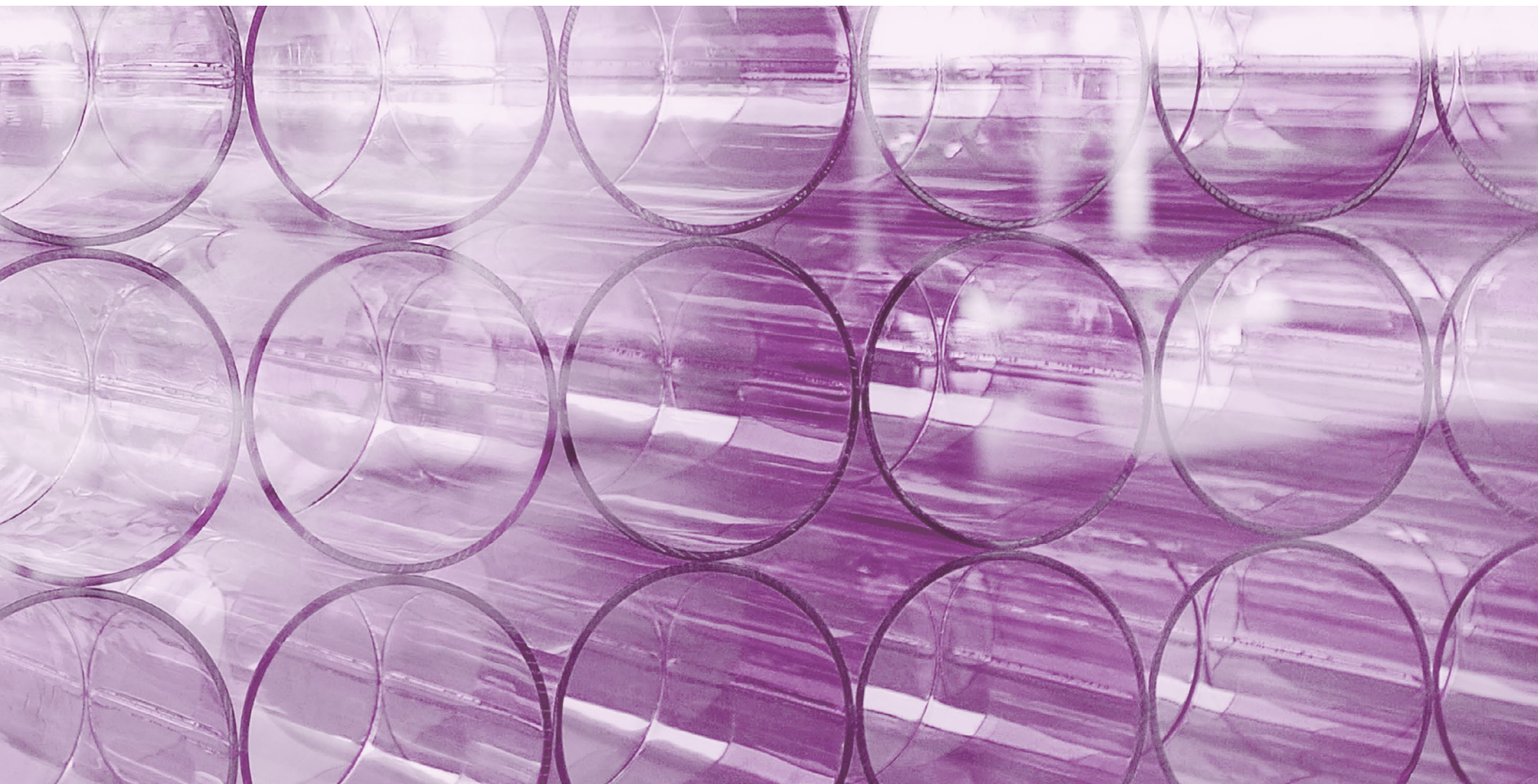


Siemens  
Integrity Initiative  
**Annual Report 2023**

[siemens.com/integrity-initiative](https://siemens.com/integrity-initiative)



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### Note:

Please refer to the following website for a general overview of the Siemens Integrity Initiative, the selection process for the First, Second and Third Funding Rounds and highlights of activities: [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

The Siemens Integrity Initiative Annual Report 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023 can be found here:

<a href="http://www.siemens.com/integrity-initiative/Report2011">www.siemens.com/integrity-initiative/Report2011</a>	<a href="http://www.siemens.com/integrity-initiative/Report2016">www.siemens.com/integrity-initiative/Report2016</a>	<a href="http://www.siemens.com/integrity-initiative/Report2021">www.siemens.com/integrity-initiative/Report2021</a>
<a href="http://www.siemens.com/integrity-initiative/Report2012">www.siemens.com/integrity-initiative/Report2012</a>	<a href="http://www.siemens.com/integrity-initiative/Report2017">www.siemens.com/integrity-initiative/Report2017</a>	<a href="http://www.siemens.com/integrity-initiative/Report2022">www.siemens.com/integrity-initiative/Report2022</a>
<a href="http://www.siemens.com/integrity-initiative/Report2013">www.siemens.com/integrity-initiative/Report2013</a>	<a href="http://www.siemens.com/integrity-initiative/Report2018">www.siemens.com/integrity-initiative/Report2018</a>	<a href="http://www.siemens.com/integrity-initiative/Report2023">www.siemens.com/integrity-initiative/Report2023</a>
<a href="http://www.siemens.com/integrity-initiative/Report2014">www.siemens.com/integrity-initiative/Report2014</a>	<a href="http://www.siemens.com/integrity-initiative/Report2019">www.siemens.com/integrity-initiative/Report2019</a>	
<a href="http://www.siemens.com/integrity-initiative/Report2015">www.siemens.com/integrity-initiative/Report2015</a>	<a href="http://www.siemens.com/integrity-initiative/Report2020">www.siemens.com/integrity-initiative/Report2020</a>	

Kindly note that the online version of this Annual Report 2023, available at [www.siemens.com/integrity-initiative/Report2023](http://www.siemens.com/integrity-initiative/Report2023), (the link will be activated later this year) is complemented by numerous hyperlinks which provide a wealth of additional external information on the projects funded under the Siemens Integrity Initiative.

A WORD FROM THE SIEMENS INTEGRITY INITIATIVE

# Steering Committee

● A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

Dear Reader,

Spring 2024

We are delighted to once again present our Annual Report to you. As we reflect an eventful 2023, filled with opportunities and challenges, both locally and internationally, our sincere hope is that you, our valued partners and stakeholders, were able to successfully steer through these demanding times.

15 years ago, on July 2, 2009, the World Bank Group announced a comprehensive Settlement with Siemens. As part of the Settlement, Siemens agreed to cooperate in changing industry practices, to clean up procurement practices and engage in Collective Action with the World Bank Group to fight fraud and corruption. As a consequence, Siemens conceptualized and set up the Siemens Integrity Initiative to support projects and organizations in the fight against corruption and fraud with funding of USD 100 million over 15 years.

This funding was supplemented on March 15, 2013 by a separate Settlement with the European Investment Bank (EIB) worth EUR 13,64 million over 5 years.

As of May 2, 2024, the full amount of both Settlements was committed to 85 Projects in over 50 countries across all Funding Rounds and we have disbursed all funds to our Project Partners in accordance with the agreed Funding Agreements, Budgets, and Workplans, thereby fulfilling the Settlement cash-out obligations.

The project proposals for all Funding Rounds were subjected to careful cross-functional due diligence before presenting them to us, the Siemens Steering Committee, for approval, and then to the World Bank as part of the non-veto process and to the European Investment Bank for informational purposes.



19 Projects, thereof 3 EIB Settlement projects, will continue the scheduled implementation of activities until no later than summer 2025. As before, we will continue with status updates for these projects.

The most recent accomplishments of the Siemens Integrity Initiative are found in this Annual Report 2023, with exciting and impressive summaries of project activities and outcomes in Section C based on information provided by our Integrity Partners as of key date March 1, 2024.

We, the Steering Committee, have received regular updates on the progress of activities from the Project Office and their cross-functional team, and we are convinced that the active portfolio of funded Projects is optimally positioned to advance Collective Action into new and broader horizons.

Collective Action is our shared fight against corruption and to promote responsible business conduct and integrity in many thematic areas including, for example, creating alliances, strengthening the rule of law, strengthening voluntary standards, creating incentives for good performers, curricula development, capacity building, platforms for dialog and knowledge sharing.

Over the course of the past 14 years these activities have demanded continuous perseverance, yet every single step has undeniably proven to be worthwhile. Throughout this journey, numerous dedicated stakeholders have rallied together at various levels, be it on a global scale, within individual countries, or with a specific focus on various business sectors.

We take great satisfaction in the fact that, despite the multitude of challenges faced during this extensive period, we have managed to sustain robust engagement and foster meaningful dialogue.

At this point we would like to thank our committed Integrity Partners throughout the world. Through their project work together with our stakeholders, they have moved key anti-corruption topics forward both at the highest levels of engagement and on the ground at institutional level. It is their commitment that has kept project implementation real because the fulfillment of detailed set goals and milestones matter.



## ● A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

In April 2024, we have engaged the "Universal Management Group" to conduct an independent "End of Settlement Review." With evaluation work expected to ramp-up in 2025, the review results are expected to be included in our Annual Report 2025 which will be published around June 2026.

We continue as one of the largest private sector initiatives aimed at fighting corruption and promoting fair markets. A first funding was made in addition on April 13, 2023, for which [UNESCO and Siemens AG](#) signed a funding agreement to support the Global Media Defence Fund in the amount of EUR 100,000. In doing so, Siemens AG joins forces with donors on government level, becoming the first private sector contributor to this Fund.

The Global Media Defence Fund is administered by UNESCO, the specialized UN agency founded to promote peace and security

through international cooperation for the free flow of information. In this regard promoting and protecting the freedom of expression and press freedom, and the global coordination of the "[UN Plan of Action](#)" is one of the key pillars for UNESCO.

At present, we are giving consideration to our visionary "BEYOND" concept that focuses on advancing Collective Action and the Siemens Integrity Initiative. Our ultimate objective is to sustain and expand our Collective Action Network. We will keep you informed about any significant developments and eagerly anticipate the forthcoming progress.

Since 2009 we have come a long way with Collective Action and the Siemens Integrity Initiative and in many ways our activities are firmly rooted in our global organization.



**Firstly**, the global strength of our Siemens brand and our associated values – responsible, innovative and excellent – are always of utmost importance to us and serve as the basis for responsible actions as stipulated in our [Business Conduct Guidelines](#).

Consequently, our Collective Action and Siemens Integrity Initiative activities are firmly anchored in these global Business Conduct Guidelines, which affirm that:

“Siemens faces significant compliance risks in numerous markets. Collective Action is our strategic response to this challenge. Together with other companies, the public sector, and civil society, we enter into integrity and compliance pacts with our partners for business cooperation and support binding agreements for

individual sectors and markets. Through these joint efforts, we aim to create fair, level, and clean market conditions for all participants.”

Siemens has been operating worldwide for more than 175 years, even in difficult markets. It is precisely here that Collective Action and the Siemens Integrity Initiative come into play, transforming the everyday from Collective Action to Collective Impact, giving something back to society on a broader level and contributing to fairer and more transparent markets for all stakeholders.

**Secondly**, by doing so, we continue to fully align with Siemens AG's growth strategy, which includes a comprehensive sustainability agenda with a clear commitment to our

[DEGREE](#) framework, which stands for **D**ecarbonization, **E**thics, **G**overnance, **R**esource efficiency, **E**quity and **E**mployability and which is applicable to all activities across the company's businesses worldwide.

**Thirdly**, our Collective Action activities are enshrined in our Legal and Compliance strategic priorities for fiscal year 2024: “To safeguard the company and enable ethical decision making. Foster Social Responsibility and promote a level playing field through Collective Action and external thought leadership activities”.

## ● A Word from the Siemens Integrity Initiative Steering Committee

A Word from the Siemens Integrity Initiative Project Office

Through the projects of the Siemens Integrity Initiative, we continue to make a positive and sustainable overall contribution to the three frameworks as mentioned above, which includes fostering a culture of trust and adhering to ethical standards, which is very much needed for sustainable growth.

Collective Action and business integrity is much more needed than ever before and we are committed to continuing our activities in the future.

### Key figures



320,000  
Employees



€ 78 billion  
Revenue



15.4 %  
Adjusted EBITA margin for  
the Industrial Businesses



€ 8.5 billion  
Net income

Source: [Siemens Sustainability Report 2023](#), Page 2





It is again with highest appreciation that we would like to thank Sabine Zindera and her team, who designed the Collective Action program and the Siemens Integrity Initiative at the outset, and together with Shawn Teixeira, who was instrumental in setting up the Third Funding and Golden Stretch Funding Round, has ever since worked consistently at the international level to drive the projects forward with long-term strategic perspective and in-depth project management. With optimism we look forward to the benefit in years to come.

We close with a quote from the Siemens AG Sustainability Report 2023 jointly given by Dr. Roland Busch, our President and Chief Executive Officer of Siemens AG, and Judith Wiese, our Chief People and Sustainability Officer (CPSO), Member of the Managing Board of Siemens AG and Labor Director, who emphasize that:

"We have a clear position on responsible business conduct. Ethical behavior, integrity and compliance are nonnegotiable. They go beyond strict adherence to rules by firmly placing responsible action sustainably at the core of our culture and business conduct."

#### **Steering Committee of the Siemens Integrity Initiative:**

Dr. Andreas Christian Hoffmann  
General Counsel, Siemens AG

Annette Kraus  
Chief Compliance Officer, Siemens AG

Dr. Horst J. Kayser  
Corporate Vice President and Chairman  
of the Siemens Portfolio Companies (POC),  
Siemens AG

A WORD FROM THE SIEMENS INTEGRITY INITIATIVE

# Project Office

A Word from the Siemens Integrity  
Initiative Steering Committee

• A Word from the Siemens Integrity  
Initiative Project Office

Dear Reader,

Spring 2024

“Operating with integrity and in compliance with laws and regulation is fundamental to stakeholder trust and our company’s continued success. Siemens and its roughly 320,000 employees operate in multiple countries around the world. Our customers in both the private and public sectors serve a vast array of industries. Our global business operations are governed by numerous national legal systems and take place in a variety of political, social, and cultural settings that are constantly changing. Therefore, Siemens’ business and compliance environment is correspondingly complex.

The way that Siemens and our partners do business impacts the markets and societies where we operate. Unethical and unlawful conduct like corruption, cartel arrangements, and money laundering can distort competition, hinder economic development, and threaten human rights and democracy.

As a global player, Siemens is responsible for setting an example in all its operations and in collaboration with all its stakeholders. By building alliances against corruption and promoting fair competition together with stakeholders from politics, business, and society, Siemens can through Collective Action help establish the conditions for fair competition and thereby promote innovation.”

This strong commitment anchored in our [Sustainability Report 2023](#) (Page 32) supports our long-standing work in Collective Action against corruption which ensures practical implementation of the Sustainable Development Goal 16 “Peace, Justice and Strong Institutions” and is anchored in our DEGREE framework which stands for decarbonization, ethics, governance, resource efficiency, equity, and employability.

It goes on to state: “In collaboration with other international and national organizations, we



are committed to fighting corruption and promoting fair competition in our markets and beyond.” (Page 33) and “... for substantial progress to be made in combating corruption and fostering fair competition, large numbers of stakeholders must act collectively.”

And this is exactly what we do and what we stand for.

Nobody can do it alone, we need all hands on deck to jointly make a difference. Over the last decade, the Collective Action method has met with international recognition among international and regional organizations as well as government and private sector representatives: We need to continue our work on all levels.

The Siemens Integrity Initiative is a key driver in fostering and anchoring Collective Action globally and at all levels. As previously reported, the Siemens Integrity Initiative was conceptualized and established in 2009,

based on the Settlement with the World Bank Group, which was announced on July 2, 2009. The Initiative has since then played a pivotal role in promoting and advancing Collective Action and Education and Training globally.

As part of the Settlement with the World Bank Group, Siemens agreed to cooperate in changing industry practices, cleaning up procurement practices and engaging in Collective Action with the World Bank Group to fight fraud and corruption and committed funding worth USD 100 million over the next 15 years. This funding was complemented on March 15, 2013 by a separate Settlement with the European Investment Bank (EIB), worth EUR 13,64 million over five years.

We are pleased to confirm that as of May 2, 2024 the entire amount of both Settlements has been committed to 85 projects in over 50 countries for all Funding Rounds, and all funds have been disbursed to our Project Partners in

accordance with the Funding Agreements, Budgets, and Workplans. We have therefore fulfilled the Settlement cash-out obligations.

Through these efforts, we have made a successful and substantial private sector contribution to the global fight against corruption, as already evidenced by the independent Mid-term Review published in our [Annual Report 2017](#). Building on this, we have, as aligned with our Settlement parties, engaged in April 2024 the "Universal Management Group" to perform an independent "End of Settlement Review". Our aim is to publish the results and findings in the Annual Report 2025 scheduled for publication in June 2026.

19 Projects, thereof 3 EIB Settlement projects, will continue the scheduled implementation of activities until no later than summer 2025. As before, we will continue with status updates for these projects.

A Word from the Siemens Integrity  
Initiative Steering Committee

● A Word from the Siemens Integrity  
Initiative Project Office

You can find further information about the status of the Third Funding Round and its projects in Section C3. and about the status of the Golden Stretch and its projects in Section C4. of this Annual Report 2023.

We would like to take the opportunity to express our gratitude for the productive collaboration we have had with the World Bank Group and the European Investment Bank over the past years. We very much appreciate the bi-annual formal meetings and discussions, whether in person or virtually: These have made it possible for us to provide structured updates on the status and progress of the Siemens Integrity Initiative, based on the approval of our Siemens Steering Committee and in fulfillment of the requirement to present our Annual Report as part of the Settlements. The guidance and words of appreciation were very helpful and supportive and contributed well to our work over the last 15 years!

In this context, we are pleased to confirm that Siemens AG has since the Settlement reflected the Settlement commitment as an auditable reserve on its balance sheet, and that all payment and accrual related bookings were accurately documented in the Siemens SAP System. The numbers were audited on a regular basis via the Siemens Internal Control-System and by independent auditors for the Siemens Group with no findings over the whole reporting period.

Together with our stakeholders and project partners we are committed to achieving the goals in the best way possible and will continue to do so in the future.

Our first non-settlement funding was made in addition on April 13, 2023, for which [UNESCO and Siemens AG](#) signed a funding agreement to support the Global Media Defence Fund in the amount of EUR 100,000. In doing so, Siemens AG joins forces with donors on government level, becoming the first private sector contributor to this Fund.

The Global Media Defence Fund is administered by UNESCO, the specialized UN agency founded to promote peace and security through international cooperation for the free flow of information. In this regard promoting and protecting the freedom of expression and press freedom, and the global coordination of the [“UN Plan of Action”](#) is one of the key pillars for UNESCO.

And we hope there is more to come as we look at continuing or engagement in Collective Action through the Siemens Integrity Initiative well “Beyond” the World Bank and European Investment Bank Settlements in order to sustain and expand our Collective Action Network, which is continuously growing and being strengthened.



Once again we would like to express our utmost appreciation to our Project Partners who have shown unwavering commitment in finding innovative solutions to keep activities focused and effective despite many limitations and unexpected challenges. The extent of restrictions, delays or setbacks out of turbulence in the respective contexts or environments is yet to be determined.

Nevertheless, we remain resolute in our expectations and commitment to giving our best effort daily to ensure the successful implementation of agreed targets.

The overall requirement of real implementation reflects our ambition to deliver “more than just paper”. This is also acknowledged in the Business 20, an official Engagement Group of the political G20. In 2023 we were again accredited as a member of the B20 Action Council on ESG in Business in India where we

promoted Collective Action activities and the Siemens Integrity Initiative as a source of practical implementation.

Consequently, as an example, the B20 Collective Action Hub run by the Basel Institute on Governance and funded by the Siemens Integrity Initiative, was integrated into the final B20 Policy Paper. The B20 Hub was initiated in 2013 and it contains a database of over 280 Collective Action initiatives and projects designed to raise standards of integrity and fair competition and governance that provides a wide variety of examples and inspiration for companies, large and small, and almost all industry sectors, including governance and sustainability initiatives.

We would like to encourage you, dear Reader, to visit [www.collective-action.com](http://www.collective-action.com) for a wealth of additional information and insight in this regard.

We are delighted to be able to continue our work and lend our professional support to the strategic principles of the Brazilian B20 Presidency in 2024 under the banner of “Inclusive Growth for a Sustainable Future” through direct engagement or in collaboration with our project partners.

In a joint Collective Action effort with many stakeholders from all around the world and long-standing key experts of the previous B20 Integrity and Compliance Task forces we were able to bring back the B20 Integrity and Compliance Task force under the Brazilian Presidency, after having seen a pause in 2023.

Another highlight and event that stood out in 2023 was our participation in the United Nations Conference of the States Parties to the United Nations Convention against Corruption (UNCAC) in December 2023 in Atlanta (CoSP10) and our



A Word from the Siemens Integrity  
Initiative Steering Committee

● A Word from the Siemens Integrity  
Initiative Project Office

contribution to the activities of the Private Sector Forum, organized by the United Nations Office on Drugs and Crime (UNODC) and the United Nations Global Compact (UNGC), which took place parallel to the CoSP10.

As described on the [conference website](#), the conference offered a platform for participants to engage with one another in person, take stock of Collective Action efforts, and exchange on how the private sector, civil society and government can better work together to address common issues relating to corruption.

What stakeholders can collectively bring to the table is more than impressive!

A very special word of gratitude and appreciation goes to the members of our Steering Committee, who have received regular, detailed updates about the Integrity Initiative throughout 2023 and have continued to support us with valuable advice and supervision, helping us to think ahead with optimism to further foster our sustainable Collective Action Network and to provide clear direction in aligning our actions and activities especially in these turbulent times.

Our deepest and very important expression of gratitude goes to our valued Integrity Partners, whose dedication and extensive work on the

ground make the implementation of agreed activities possible.

A sincere thank you also to our Project Relationship Managers for their insights and “eyes and ears” support at local level, and our gratitude to our high-level mentors for their invaluable guidance and local expertise, and to our functional experts for their meaningful and professional support.

Let’s keep the momentum going!

**Sabine Zindera and Shawn Teixeira**

**For the Project Office of the  
Siemens Integrity Initiative**

**This Annual Report was approved by the Siemens Steering Committee on April 15, 2024 and submitted together with a comprehensive presentation to the World Bank Group in Washington on April 30, 2024 and to the European Investment Bank in Luxembourg in June 2024.**





**The Collective Action and External Affairs team is headquartered in Munich, Germany:**

Sabine Zindera, Vice President, heads the Collective Action and External Affairs department in the Siemens Legal and Compliance Organization and is supported by Shawn Teixeira and Monika Besel, as well as the network of Siemens Business Leaders, Siemens Country CEOs, Compliance Officers, Controlling and Finance, Legal and Tax experts all around the world.

Under the terms of the agreement between Siemens and the World Bank, the World Bank has audit rights over the use of funds (USD 100 million dollars over 15 years beginning in 2009) and veto rights over Siemens' selection of projects and organizations to be supported. Furthermore, the agreement between Siemens and the European Investment Bank (EUR 13,64 million over 5 years) gives the EIB the right to reject proposed projects.

The projects were chosen according to defined selection criteria and focus areas and underwent a detailed cross-functional due diligence. More information is available on our dedicated web site [www.siemens.com/integrity-initiative](https://www.siemens.com/integrity-initiative).

The Siemens Integrity Initiative is managed by a global project organization with in-country presence and support where relevant and is subject to project management rules as detailed in Section A of this report.

The Project Office regularly updates the Siemens Steering Committee, the World Bank Group and the European Investment Bank on the status and progress of the Siemens Integrity Initiative.

As of March 1, 2024, around USD 120 million is committed to 85 projects in more than 50 countries over all Funding Rounds.

A Word from the Siemens Integrity  
Initiative Steering Committee

● A Word from the Siemens Integrity  
Initiative Project Office

Much of the information available to us is transparently accessible to the public and can be viewed on our dedicated web site [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

The information provided relates in particular to the framework conditions for the First, Second, Third and Golden Stretch Funding Rounds, the application and selection process for the projects, brief profiles and the funds earmarked for the individual projects, and unabridged versions of the Siemens Integrity Initiative Annual Reports for 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023.

Two editions stand out and merit further mention:

Our very first 2011 edition introduced to you the Siemens Collective Action program, and in Sections A and B of the report provided insight into the conceptualization, planning, project selection, award of funds and project implementation relating to the First Funding Round tranche of USD 37,7 million.

Our seventh 2017 edition signaled the half-way mark of the 15-year World Bank settlement period and featured a Summary Report of the external Mid-term Review of the Integrity Initiative in Section D. The Mid-term Review was independently conducted by the Canadian Universal Management Group who found there to be “strong evidence”



that projects have “achieved their intended short-term results” and have made “significant contributions to change within their respective contexts”.

We hope that this will encourage additional allies to sign up to Collective Action and join us in our fight against corruption. The positive external and internal feedback received in response to our reports, and especially to our externally conducted Mid-term Review has strengthened our resolve to extend our program even further, enabling us to highlight more and more anti-corruption success stories across all countries and, in so doing, integrate additional stakeholders and activities.

As reported, all 31 projects from our First Funding Round have been completed as planned. The Final Report on these activities over the entire project period has already been presented in earlier editions of the Annual Report.

The Final Report of activities over the entire project period for all 24 Second Funding Round projects were presented in previous Annual Report editions. Two Final Reports were presented in our Annual Report 2017, ten Final Reports in Annual Report 2018, ten Final Reports in Annual Report 2019 and two Final Reports in Annual Report 2020.

This year we again focus on our projects from the Third and Golden Stretch Funding Rounds.

Of the 22 Third Funding Round projects, 11 projects have completed their activities.

3 Final Reports of activities over the entire project period were presented in Annual Report 2022, and 8 Final Reports are included in this Annual Report 2023.

11 projects remain active with implementation of activities still in progress.

All 8 Projects of the Golden Stretch Funding Round started their implementation phase in July 2021 and implementation of activities are in progress as described in this report.



# Introduction

The main objective of the Siemens Integrity Initiative is to create fair market conditions for all market participants by fighting corruption and fraud through Collective Action as well as Education and Training.

The Initiative focuses on supporting projects that have a clear impact on the business environment, can demonstrate objective and measurable results, and have the potential to be scaled up and replicated.



#### The Siemens Integrity Initiative aims to:

- Raise standards and create awareness of compliance and business integrity
- Create a common platform for dialog with the private and public sectors
- Strengthen the rule of law

Under the umbrella of the Siemens Integrity Initiative, Siemens will disburse funds to support non-profit organizations worldwide that promote business integrity and the fight against corruption.

Moving beyond the boundaries of our company, Collective Action continues as a priority in Siemens Legal and Compliance. This is evidenced by our long-standing involvement in the ICC Commission on Corporate Responsibility and Anti-corruption, the Pact Against Corruption

Initiative (PACI) of the World Economic Forum and, since 2011, our active involvement in the G20/B20 Task Force on Anti-corruption and the drafting and implementation support of B20 Recommendations drawn up in France, Mexico, Russia, Australia, Turkey, China, Germany, Argentina, Japan, Saudi Arabia, Italy, Indonesia, India and now in 2024, Brazil.

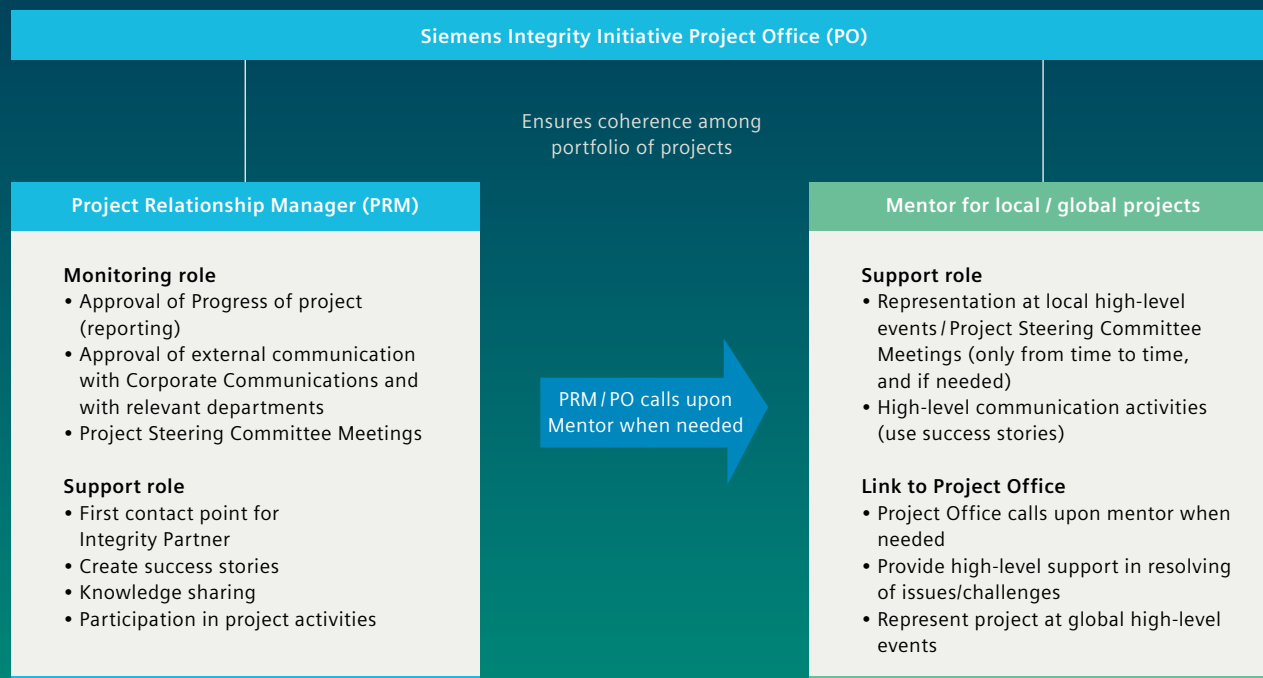
We remain committed to the 10 principles of the United Nations Global Compact, and support the implementation of the United Nations Convention against Corruption, as well as the OECD Anti-Bribery Convention. These principles and conventions guided our thematic considerations in project designs which were taken up by our Integrity Partners for implementation through certain modules in our Siemens Integrity Initiative projects.

# Project management and reporting

- Responsibility for managing the projects funded under the Siemens Integrity Initiative lies with the respective Integrity Partner. Siemens supports projects financially, monitors the use of funds in a biannual reporting process, and participates in activities where appropriate and requested by the Integrity Partner
- The main points relating to the management of projects are regulated in a Funding Agreement between Siemens and the Integrity Partners and its Project Partners
- Funds are paid out subject to the achievement of milestones and on a biannual basis
- Integrity Partners report annually on progress, funds used and work plans for the next year. All Annual Reports must be accompanied by a financial report that has been audited by an external audit company. Regular Interim Reports help to review progress throughout the year. All Annual Reports must be reviewed and approved by the local Siemens Project Relationship Manager, the Siemens Finance Department, and the Siemens Integrity Initiative Project Office
- Siemens has set up an internal project structure for selecting projects and for supporting and monitoring projects during the implementation phase, as well as a system for capturing and evaluating impact
- Siemens supports all projects with a designated Project Relationship Manager and a Mentor from senior management
- Country-specific projects, for example, can draw on the CEO of the local Siemens company as their Mentor. All Project Relationship Managers (PRMs) are coordinated by the Siemens Integrity Initiative Project Office (see also Project Organization)
- A project completion process is in place which includes the submission of a Final Report, consisting of a Final Progress Report and an Audit Report with project financials prepared by an independent Auditor, as well as the submission of an End of Project Evaluation and a Final Payment Request



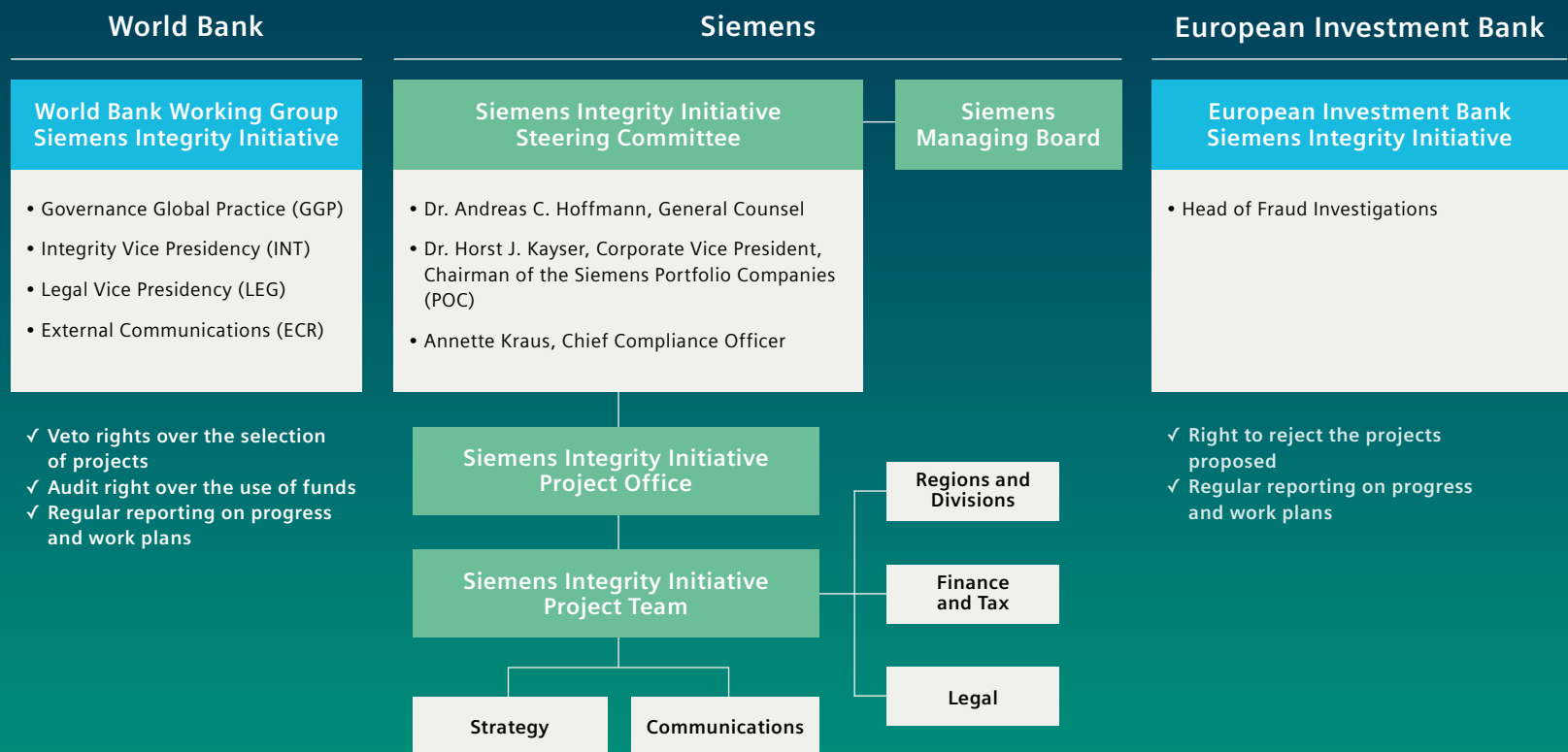
## Roles and responsibilities of Project Relationship Managers and Mentors:



# Project organization

- The internal Siemens project management structure of the Initiative consists of several dedicated teams that provide overall supervision and guidance (such as the Steering Committee) and deal with daily operations of the Initiative (Siemens Project Office, Project Team and Project Relationship Managers)
- To make this Initiative a company-wide effort and ensure engagement and representation, all relevant business fields of Siemens have been integrated into the structure of the Initiative
- The main operational contact for this Initiative is the Siemens Project Office in Munich and operates with four people globally, and is in addition supported by an extended Project Team from various Siemens departments (Legal and Compliance, Finance, Tax, Strategy, Communications and Compliance colleagues in all relevant countries)
- The Project Office is the main link to the World Bank Group with regard to the audit and veto rights as well as reporting obligations. It is also the main link to the European Investment Bank (EIB) with regard to their rights to reject projects proposed as well as reporting obligations
- The work of the Project Office and Project Team is overseen by the Siemens Integrity Initiative Steering Committee, which consists of Dr. Andreas Christian Hoffmann, General Counsel, Siemens AG; Ms. Annette Kraus, Chief Compliance Officer, Siemens AG; and Dr. Horst J. Kayser, Corporate Vice President, Chairman of the Siemens Portfolio Companies (POC), Siemens AG
- As the World Bank Group has veto and audit rights, and the European Investment Bank has the right to reject proposed projects, they have set up a team of experts to liaise with Siemens regarding the Siemens Integrity Initiative, as shown in the chart

Siemens Integrity Initiative project structure with settlement parties:





## • Siemens Integrity Initiative

# Siemens Integrity Initiative

On July 2, 2009, the World Bank Group announced a comprehensive settlement with Siemens. As part of the settlement, Siemens agreed to cooperate to change industry practices, clean up procurement practices and engage in Collective Action with the World Bank Group to fight fraud and corruption.

Siemens subsequently set up the Siemens Integrity Initiative to support projects and organizations fighting corruption and fraud with funding worth USD 100 million over the next 15 years.

This funding was complemented on March 15, 2013 by a separate settlement with the European Investment Bank (EIB), worth EUR 13,64 million over five years.



## Status of the First Funding Round

In the First Funding Round, thirty-one projects from over twenty countries were selected to receive a total funding of up to USD 40 million.

As reported in our Annual Report 2016, as of **March 3, 2017**, all 31 projects had completed their scheduled activities.

The final overviews of activities for the entire project period were reported on in various Siemens Integrity Initiative Annual Reports from 2011 to 2017.

These projects are marked in the table on page 32 and further information on the projects is available on [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

For information on Collective Action, the Siemens Integrity Initiative, the selection process and criteria, and funded projects, please visit [www.siemens.com/collective-action](http://www.siemens.com/collective-action).

A detailed description of activities implemented during the first to the seventh year (2011 to 2017) was provided in the Siemens Integrity Initiative Annual Report 2011, 2012, 2013, 2014, 2015, 2016 and 2017.

[www.siemens.com/integrity-initiative/Report2011](http://www.siemens.com/integrity-initiative/Report2011)  
[www.siemens.com/integrity-initiative/Report2012](http://www.siemens.com/integrity-initiative/Report2012)  
[www.siemens.com/integrity-initiative/Report2013](http://www.siemens.com/integrity-initiative/Report2013)  
[www.siemens.com/integrity-initiative/Report2014](http://www.siemens.com/integrity-initiative/Report2014)  
[www.siemens.com/integrity-initiative/Report2015](http://www.siemens.com/integrity-initiative/Report2015)  
[www.siemens.com/integrity-initiative/Report2016](http://www.siemens.com/integrity-initiative/Report2016)  
[www.siemens.com/integrity-initiative/Report2017](http://www.siemens.com/integrity-initiative/Report2017)

### Key data First Funding Round

Funds committed in the First Funding Round	USD 37,7 M
Disbursements in year 1 to year 8 (2010 – June 30, 2018) (release of provision)	USD 34,8 M <sup>1)</sup>
Disbursement for Mid-term Review of the Siemens Integrity Initiative performed by Universal Management Group finalized and presented to the World Bank on December 6, 2017 covering the First and Second Funding Rounds	USD 0,18 M
Funds unspent	USD ~2,7 M
No further planned disbursements	USD 0,0 M
Number of projects First Funding Round	31
Thereof projects that have completed their activities	31
Thereof ongoing	0
Countries covered in the First Funding Round	22

**Note:** Siemens fiscal year (October 1 – September 30). Due to rounding, numbers presented may not add up precisely to the totals provided.

<sup>1)</sup> The information provided in this table is based on all approved First Funding Round Final Reports



# Status of the Second Funding Round

The Second Funding Round applies the same selection criteria and focus areas as the First Round. As the Second Round is based on the settlement agreements with the World Bank Group and the European Investment Bank, the World Bank Group has audit rights over the use of funds (USD 100 million over a period of 15 years beginning in 2009) and veto rights over the selection of projects by Siemens. The agreement between Siemens and the European Investment Bank (EUR 13,64 million over five years) gives the EIB the right to reject the projects proposed.

The Second Funding Round, with a funding volume of approximately USD 30 million for up to 25 projects plus additional projects funded on the basis of the settlement with the European Investment Bank, was launched on June 27, 2013 with a deadline for submission of proposals in August 2013.

The gradual announcement of the selected projects from the Second Funding Round started in fall 2014 and stretched until spring 2015. **24 projects** were selected for funding in the Second Funding Round with a total committed capital of **USD 35,554 million**.

The selection was made on a competitive basis in two stages (initial Expression of Interest phase and the later Full Proposal phase) with a

focus on project applications that demonstrate a clear impact on the business environment and results in sectors and countries of where Siemens is present. Projects that already submitted an Expression of Interest for the First Funding Round as well as projects that have already been funded were eligible to submit another proposal in the Second Funding Round.

The announcement, application process and selection criteria were made available transparently on the Siemens Integrity Initiative website. The initial first projects were announced in a joint press release published by Siemens, the World Bank Group and the European Investment Bank on December 10, 2014 (see [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative) or Section D of the Annual Report 2014).

All 24 Siemens Integrity Initiative Second Funding Round projects have completed their activities by March 2, 2021. The final overviews of activities for the entire project period were reported for all 24 projects in our Annual Report 2017 (2 projects), Annual Report 2018 (10 projects), Annual Report 2019 (10 Projects) and Annual Report 2020 (2 Projects) respectively. These projects are marked in the table on page 36 and further information on the projects is available on [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

## Key data Second Funding Round

Funds committed in the Second Funding Round	USD 35,554 M
Disbursements in year 1 to year 9 (2015 to March 02, 2023) (release of provision)	USD 33,92 M <sup>1)</sup>
Funds unspent	USD ~ 1,6 M
No further planned disbursements	USD 0,0 M
Number of projects	24
Thereof projects that have completed their activities	24
Thereof ongoing	0
Countries covered in the Second Funding Round	More than 20

**Note:** Siemens fiscal year (October 1 – September 30). Due to rounding, numbers presented may not add up precisely to the totals provided.

<sup>1)</sup> The information provided in this table is based on approved Annual and Final Reports as of March 02, 2023

More information on the settlements between Siemens and the World Bank Group and Siemens and the European Investment Bank (EIB) is available online as well as on the Siemens Integrity Initiative website: [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

## Status of the Third Funding Round

The Siemens Integrity Initiative announced the launch of the **Third Funding Round** in its Press Release on **March 13, 2018** as part of the July 2009 settlement between Siemens and the World Bank and the March 2013 settlement between Siemens and the European Investment Bank (EIB).

Open to applications from legal entities such as non-governmental organizations, international organizations, business associations, and academic institutions, the Siemens Integrity Initiative selection process is made on a competitive basis in two stages (initial Expression of Interest phase and the final Full Proposal phase) and favors project proposals that have a direct impact on the private sector and strengthen compliance standards and legal systems.

Entities that submitted Expressions of Interest for the first two funding rounds as well as entities that received funding in the first two funding rounds were also eligible to submit proposals for funding in the Third Funding Round.

The Project Office was truly encouraged by around 140 Expressions of Interest received by the May 8, 2018 deadline. These Expressions of Interest were submitted by local and global organizations dedicated to the fight against corruption and covered a wide range of Collective Action and Education and Training initiatives with very interesting and relevant activities proposed in over 50 countries. The total funding of more than USD 280 million applied for exceeded available funds by a factor of 9.

Siemens conducted a cross functional review and due diligence of all Expressions of Interest with reference to the stated Eligibility and Selection Criteria available at [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

After receiving **approval from the Siemens Steering Committee** as well as **the World Bank non-veto** and the **European Investment Bank no objection** decisions for short-listed projects under consideration, around 30 applicant organizations were invited in November 2018 to submit Full Proposals by January 31, 2019.

Following a second detailed cross functional review and due diligence of all submitted Full Proposals, Siemens announced the first group of projects selected under the Third Funding Round in its Press Release on **December 16, 2019**.

All Third Funding Round funding agreements were signed as of March 2, 2020, ultimately adding to the Siemens Integrity Initiative portfolio 22 new projects from more than 40 countries with committed funding of up to USD 25,2 million.

More information on the **eligibility and selection criteria** as well as the **application and selection process** is available on our web site at [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

In November 2023, committed funds increased from USD 25,2 million to **USD 25,4 million** following Add-on Funding awarded to the POLMED Third Funding Round project out of accumulated unspent funds coming from various Second and Third Funding Round Integrity Initiative projects that had already completed their respective project activities projects under the European Investment Bank settlement.

As agreed with the Siemens Steering Committee, the World Bank and the European Investment Bank respectively, the Siemens Integrity Initiative Project Office invited select active projects on a discretionary basis to submit a Supplement to the Full Proposal (Annex 1) aimed at intensifying, broadening and maximizing project activities and results in line with the project specific goals and objectives.

After the Project Office conducted a comprehensive review of the Supplement to the Full Proposal (Annex 1) which was supported by an updated Work Plan (Annex 2) and an updated Budget (Annex 3), the Add-on Funding was awarded and regulated under an addendum to the Funding Agreement.

Projects selected for funding under the Third Funding Round are listed in the table on page 40, and further information on the projects is available on [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative) and in Section C of this report.

The final overview of activities for 8 projects covering the entire project period are included in Section C3. of this Annual Report 2023. These projects are marked in the table on page 40.

#### Key data Third Funding Round

Funds committed <sup>1)</sup> in the Third Funding Round	USD	25,4 M
Disbursements in year 1 to year 5 (2019 to March 01, 2024) (release of provision)	USD	24,8 M <sup>2)</sup>
Funds unspent as of March 1, 2024	USD	~ 0,6 M
No further planned disbursements	USD	0,0 M
Number of projects		22
Thereof projects that have completed their activities		11
Thereof ongoing		11
Countries covered in the Third Funding Round		More than 40

**Note:** Siemens fiscal year (October 1 – September 30). Due to rounding, numbers presented may not add up precisely to the totals provided.

<sup>1)</sup> Committed funds increased from USD 25,2 M to USD 25,4 M following Add-on Funding out of accumulated unspent funds from completed projects under the European Investment Bank settlement

<sup>2)</sup> The information provided in this table is based on approved Annual and Final Reports as of March 01, 2024

## Status of the Golden Stretch Funding Round

In alignment with the Siemens Steering Committee and the World Bank, the Siemens Integrity Initiative Project Office in **December 2020** invited selected short-listed candidates from the Third Funding Round to submit Full Proposal applications for additional funding.

The Golden Stretch Funding Round builds on the well-established eligibility and selection criteria from previous funding rounds published at [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative), as well as the current implementation activities of selected Third Funding Round projects.

Golden Stretch applicants were required to in particular demonstrate how the sustainability of project activities and results into the future will be ensured and were further challenged to include concepts on how the projects will inspire, support and engage local based Non-Governmental Organizations as well as the Public and the Private Sector.

On the due date of **February 15, 2021**, the project office received impressive multi-faceted proposals, and in spring 2021, a team of experts from different specialist areas and regions subjected the projects to careful due diligence before presenting them to the

**Siemens Steering Committee for approval and then to the World Bank as part of the non-veto process** and to the European Investment Bank for informational purposes.

The public announcement of results was made in the [Siemens corporate press release](#) on **July 7, 2021**, which is available in Section D of the Annual Report 2021.

A total of eight additional projects with a total committed funding of **USD 20,5 million** will receive between USD 1 million and USD 4 million each over a period of three years starting from July 2021.

These eight Golden Stretch projects enhance the overall Siemens Integrity Initiative portfolio to **85 projects** in over **50 countries** with total committed funding of **around USD 120 million**.

In November 2023, committed funds increased from USD 20,5 million to **USD 21,2 million** following Add-on Funding awarded to the IACA and UNODC Golden Stretch projects out of accumulated unspent funds coming from various Second and Third Funding Round Integrity Initiative projects that had already completed their respective project activities under the World Bank settlement.

As agreed with the Siemens Steering Committee, the World Bank and the European Investment Bank respectively, the Siemens Integrity Initiative Project Office invited select active projects on a discretionary basis to submit a Supplement to the Full Proposal (Annex 1) aimed at intensifying, broadening and maximizing project activities and results in line with the project specific goals and objectives.

After the Project Office conducted a comprehensive review of the Supplement to the Full Proposal (Annex 1) which was supported by an updated Work Plan (Annex 2) and an updated Budget (Annex 3), the Add-on Funding was awarded and regulated under an addendum to the Funding Agreement.

Projects selected for funding under the Golden Stretch Funding Round are listed in the table on page 44, and further information on the projects is available in Section C4. of this Annual Report and on [www.siemens.com/integrity-initiative](http://www.siemens.com/integrity-initiative).

Key data Golden Stretch Funding Round		
Funds committed <sup>1)</sup> in the Golden Stretch Funding Round	USD	21,2 M
Disbursements in year 1 to year 4 (July 1, 2021 to March 01, 2024) (release of provision)	USD	21,2 M <sup>2)</sup>
Funds unspent as of March 1, 2024	USD	0,0 M
Further planned disbursement in year 4 (2024) <sup>3)</sup>	USD	0,5 M
Number of projects		8
Thereof projects that have completed their activities		0
Thereof ongoing		8
Countries covered in all Funding Rounds		More than 50

**Note:** Siemens fiscal year (October 1 – September 30). Due to rounding, numbers presented may not add up precisely to the totals provided.

<sup>1)</sup> Committed funds increased from USD 20,5 M to USD 21,2 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

<sup>2)</sup> The information provided in this table is based on approved Annual and Final Reports as of March 01, 2024

<sup>3)</sup> Earmarked funds for End of Settlement Review

## List of projects funded under the First Funding Round:

Integrity Partner
Basel Institute on Governance, Switzerland
Beijing New Century Academy on Transnational Corporations, China
Central European University, Hungary in cooperation with Integrity Action, United Kingdom
COCIR (European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry), Belgium
The Convention on Business Integrity, Nigeria
The Ethics Institute, South Africa
Federation of Korean Industries-International Management Institute in cooperation with Global Competitiveness Empowerment Forum, South Korea
Foundation for the Global Compact, USA in cooperation with the UN Global Compact and PRME (Principles for Responsible Management Education), USA
Foundation for the Global Compact, USA in cooperation with the UN Global Compact and its local networks
Fundación Universidad de San Andrés (FUdeSA), Argentina
Humboldt Viadrina School of Governance, Germany
International Anti-Corruption Academy (IACA), Austria
International Business Leaders Forum (IBLF), United Kingdom in cooperation with the School of Public Administration of Renmin University, China
Instituto Ethos – Ethos Institute for Business and Social Responsibility, Brazil
Maala Business for Social Responsibility, Israel
Makati Business Club, Philippines in cooperation with the European Chamber of Commerce Philippines

<sup>1)</sup> Summary of Project Activities was reported in Annual Report 2017 (1) = University of Cairo

<sup>2)</sup> Summary of Project Activities was reported in Annual Report 2016 (4) = Ethics Angola, IACA, Ethos, Maala

<sup>3)</sup> Summary of Project Activities was reported in Annual Report 2015 (9) = Basel, CEU, COCIR, CBI, PRME, UNGC, San Andres, Makati, UNDP

<sup>4)</sup> Summary of Project Activities was reported in Annual Report 2014 (14)

<sup>5)</sup> Summary of Project Activities was reported in Annual Report 2013 (2)

<sup>6)</sup> Summary of Project Activities was reported in Annual Report 2012 (1)

= Total number of all summaries 31



	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Global	1,86 M	-	completed as of September 2015 <sup>3)</sup>
	China	0,89 M	-	completed as of March 2014 <sup>4)</sup>
	Central and Eastern Europe	3,09 M	-	completed as of December 2015 <sup>3)</sup>
	Europe, Asia, Russia, South America	0,96 M	-	completed as of September 2014 <sup>3)</sup>
	Nigeria	1,1 M	-	completed as of December 2014 <sup>3)</sup>
	Angola, South Africa	1,5 M	-	completed as of September 2016 (Angola) <sup>2)</sup> ; completed as of September 2015 (South Africa)
	South Korea	0,81 M	-	completed as of March 2014 <sup>4)</sup>
	Global	1,48 M	-	completed as of January 2015 <sup>3)</sup>
	Brazil, Egypt, India, Nigeria, South Africa	2,87 M	-	completed as of January 2015 <sup>3)</sup>
	Argentina	0,73 M	-	completed as of September 2014 <sup>3)</sup>
	Global	1,3 M	-	completed as of May 2014 <sup>4)</sup>
	Global	2,02 M	-	completed as of December 2015 <sup>2)</sup>
	China, Russia	1,5 M	-	completed as of December 2013 <sup>5)</sup>
	Brazil	3,11 M	-	completed as of June 2016 <sup>2)</sup>
	Israel	0,48 M	-	completed as of September 2015 <sup>2)</sup>
	Philippines	1,04 M	-	completed as of March 2015 <sup>3)</sup>

- <sup>1)</sup> Summary of Project Activities was reported in Annual Report 2017 (1) = University of Cairo
- <sup>2)</sup> Summary of Project Activities was reported in Annual Report 2016 (4) = Ethics Angola, IACA, Ethos, Maala
- <sup>3)</sup> Summary of Project Activities was reported in Annual Report 2015 (9) = Basel, CEU, COCIR, CBI, PRME, UNGC, San Andres, Makati, UNDP
- <sup>4)</sup> Summary of Project Activities was reported in Annual Report 2014 (14)
- <sup>5)</sup> Summary of Project Activities was reported in Annual Report 2013 (2)
- <sup>6)</sup> Summary of Project Activities was reported in Annual Report 2012 (1)

= Total number of all summaries 31

## Integrity Partner

Organisation for Economic Co-operation and Development (OECD), MENA-OECD Investment Programme, France

Oživení, Czech Republic in cooperation with Transparency International Slovakia and the Economics Institute of the Academy of Sciences of the Czech Republic

Partnership for Governance Reform – Kemitraan, Indonesia

POLMED (The Polish Chamber of Commerce of Medical Devices), Poland

Sequa gGmbH, Germany in cooperation with German Agency for International Cooperation (GIZ), Chengdu General Chamber of Commerce (Province of Sichuan), China, and Hunan Provincial Chamber, China

Transparency International Bulgaria

Transparency International Italy

Transparency International Mexico

Transparency International USA in cooperation with Social Accountability International, USA

United Nations Development Programme Regional Bureau for Arab States, USA

United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – Incentives to Corporate Integrity

United Nations Office on Drugs and Crime (UNODC), Austria – UNCAC Outreach and Communication

United Nations Office on Drugs and Crime (UNODC), Austria in cooperation with the International Anti-Corruption Academy (IACA), Austria – The 6P's

University of Cairo, Center for Economic and Financial Research and Studies (CEFRS), Egypt

Vietnam Chamber of Commerce and Industry (VCCI) in cooperation with the International Business Leaders Forum (IBLF), United Kingdom

Total funding volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Middle East and North Africa	0,75 M	-	completed as of September 2013 <sup>5)</sup>
	Czech Republic, Slovakia	0,6 M	-	completed as of March 2014 <sup>4)</sup>
	Indonesia	1,5 M	-	completed as of December 2014 <sup>4)</sup>
	Poland	0,46 M	-	completed as of September 2014 <sup>4)</sup>
	China	1,49 M	-	completed as of March 2014 <sup>4)</sup>
	Bulgaria	0,45 M	-	completed as of February 2014 <sup>4)</sup>
	Italy	0,6 M	-	completed as of March 2014 <sup>4)</sup>
	Mexico	0,23 M	-	completed as of May 2014 <sup>4)</sup>
	USA, Global	0,66 M	-	completed as of September 2014 <sup>4)</sup>
	Arab States Region	1,78 M	-	completed as of December 2014 <sup>3)</sup>
	India, Mexico	1,12 M	-	completed as of September 2014 <sup>4)</sup>
	Global	0,75 M	-	completed as of September 2014 <sup>4)</sup>
	India, Mexico	1,22 M	-	completed as of September 2014 <sup>4)</sup>
	Egypt	0,85 M	-	completed as of February 2017 <sup>1)</sup>
	Vietnam	0,5 M	-	completed as of September 2012 <sup>6)</sup>
		37,7 M	0 M	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 37,7 M for the First Funding Round.

## List of projects funded under the Second Funding Round:

Integrity Partner
Al Akhawayn University in Ifrane (AUI), Morocco
Basel Institute on Governance, Switzerland, in cooperation with the Organisation for Economic Co-operation and Development (OECD), France, and the Foundation for the Global Compact, USA
Beijing New Century Academy on Transnational Corporations (NATC), China
Confederation of Indian Industry (CII), India
Ethics and Reputation Society / Etik ve Itibar Dernegi (TEID), Turkey
Foundation for the Global Compact, USA, in cooperation with the Egyptian Junior Business Association, Egypt
Global Compact Network India (GCNI), India
Global Compact Network Korea (GCNK), Korea, in cooperation with the Global Competitiveness Empowerment Forum (GCEF), South Korea
International Anti-Corruption Academy (IACA), Austria
MedTech Europe <sup>5)</sup> (formerly Eucomed), Belgium
Organisation for Economic Co-operation and Development (OECD), France
Organisation for Economic Co-operation and Development (OECD), France
Pan African Lawyers Union (PALU), Tanzania
Pearl Initiative, United Arab Emirates
The Ethics Institute, South Africa, in cooperation with the Institute of Directors Mozambique, Mozambique (IoDMZ)

<sup>1)</sup> Summary of Project Activities for entire project period was reported in Annual Report 2017 (2) = NATC, PALU

<sup>2)</sup> Summary of Project Activities for entire project period was reported on in Annual Report 2018 (10) = Al Akhawayn University, MedTech, OECD (Russia), POLMED, TEID, TI Italy, TI Secretariat, UNGC Egypt, UNGC Korea, WU Vienna

<sup>3)</sup> Summary of Project Activities for entire project period reported in Annual Report 2019 (10) = Basel Institute on Governance, CII, Global Compact Network India, OECD (Morocco), TEI (Mozambique), TEI (South Africa), TI España, UNODC (Colombia), UNDP (Egypt, Morocco and Tunisia), UNDP (Iraq and Libya)

<sup>4)</sup> Summary of Project Activities for entire project period reported in Annual Report 2020 (2) = IACA, PEARL

<sup>5)</sup> Transfer from Eucomed to MedTech effective January 1, 2017

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Morocco	0,55 M	-	completed as of May 2018 <sup>2)</sup>
	Global	4,00 M	-	completed as of December 2018 <sup>3)</sup>
	China	1,50 M	-	completed as of September 2017 <sup>1)</sup>
	India	0,70 M	-	completed as of March 2019 <sup>3)</sup>
	Turkey	1,76 M	-	completed as of November 2017 <sup>2)</sup>
	Egypt	1,40 M	-	completed as of June 2018 <sup>2)</sup>
	India	0,73 M	-	completed as of March 2019 <sup>3)</sup>
	Republic of Korea (South Korea)	0,90 M	-	completed as of March 2018 <sup>2)</sup>
	Global	-	4,98 M	completed as of December 2019 <sup>4)</sup>
	Middle East and North Africa	0,85 M	-	completed as of May 2018 <sup>2)</sup>
	Morocco	-	0,70 M	completed as of December 2018 <sup>3)</sup>
	Russia	1,55 M	-	completed as of June 2018 <sup>2)</sup>
	Africa	0,93 M	-	completed as of September 2017 <sup>1)</sup>
	GCC countries (United Arab Emirates, Kingdom of Saudi Arabia, Bahrain, Qatar, Kuwait, Oman)	0,88 M	-	completed as of October 2020 <sup>4)</sup>
	Mozambique	0,55 M	-	completed as of September 2019 <sup>3)</sup>

<sup>1)</sup> Summary of Project Activities for entire project period was reported in Annual Report 2017 (2) = NATC, PALU

<sup>2)</sup> Summary of Project Activities for entire project period was reported on in Annual Report 2018 (10) = Al Akhawayn University, MedTech, OECD (Russia), POLMED, TEID, TI Italy, TI Secretariat, UNGC Egypt, UNGC Korea, WU Vienna

<sup>3)</sup> Summary of Project Activities for entire project period reported in Annual Report 2019 (10) = Basel Institute on Governance, CII, Global Compact Network India, OECD (Morocco), TEI (Mozambique), TEI (South Africa), TI España, UNODC (Colombia), UNDP (Egypt, Morocco and Tunisia), UNDP (Iraq and Libya)

<sup>4)</sup> Summary of Project Activities for entire project period reported in Annual Report 2020 (2) = IACA, PEARL

<sup>5)</sup> Transfer from Eucomed to MedTech effective January 1, 2017

## Integrity Partner

The Ethics Institute, South Africa

The Polish Chamber of Commerce of Medical Devices (POLMED), Poland

Transparency International Secretariat (TI-S), Germany

Transparency International España (TI-España), Spain

Transparency International Italia (TI-It), Italy, in cooperation with the Centro Ricerche e Studi su Sicurezza e Criminalità (RiSSC), Fondazione Centro Studi Investimenti Sociali (CENSIS), Istituto per la Promozione dell'Etica in Sanità (ISPE-Sanità), Italy

United Nations Office on Drugs and Crime (UNODC), Austria

United Nations Development Programme (UNDP), USA

United Nations Development Programme (UNDP), USA

Wirtschaftsuniversität WU, Vienna University of Economics and Business Administration, Austria

## Total Funding Volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	South Africa	0,80 M	-	completed as of September 2019 <sup>3)</sup>
	Poland	0,65 M	-	completed as of September 2018 <sup>2)</sup>
	Global	3,06 M	-	completed as of September 2018 <sup>2)</sup>
	Spain	1,27 M	-	completed as of January 2019 <sup>3)</sup>
	Italy	1,12 M	-	completed as of September 2018 <sup>2)</sup>
	Colombia	1,20 M	-	completed as of January 2019 <sup>3)</sup>
	Arab Region including Egypt, Morocco and Tunisia	-	2,27 M	completed as of September 2019 <sup>3)</sup>
	Arab Region including Iraq and Libya	1,52 M	-	completed as of September 2019 <sup>3)</sup>
	Africa	1,70 M	-	completed as of March 2018 <sup>2)</sup>
		27,62 M	7,95 M	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 35,554 M for the Second Funding Round.



## List of projects funded under the Third Funding Round:

Integrity Partner
Basel Institute on Governance, Switzerland, in cooperation with the Organisation for Economic Co-operation and Development (OECD), France
Beijing New Century Academy on Transnational Corporations (NATC), China
East China Normal University (ECNU), China
East-West Center (EWC), USA
Etik ve İtibar Derneği (TEİD), Turkey
Eurocham, (Chambre de Commerce Européenne en Côte d'Ivoire), Ivory Coast
Foundation for the Global Compact, USA
Fundación Poder Ciudadano (Transparency International Argentina), Argentina
Global Compact Network Korea (GCNK), Korea, in cooperation with the Korea Sustainability Investing Forum (KoSIF)
International Anti-Corruption Academy (IACA), Austria
Kazakhstan Bar Association (KazBar), Kazakhstan
Maritime Anti-Corruption Network (MACN), Denmark 1) in cooperation with the Convention on Business Integrity, Nigeria

<sup>1)</sup> Transfer from Business for Social Responsibility (BSR) to Maritime Anti-Corruption Network (MACN) effective April 1, 2021

<sup>2)</sup> Mutual Agreement for Termination with East West Centre (EWC) reached on August 11, 2022 after new strategic directions of EWC are no longer a perfect match with the objectives of the Project. Summary of Project Activities for entire project period reported in Annual Report 2022 (1) = EWC

<sup>3)</sup> Summary of Project Activities for entire project period reported in Annual Report 2022 (2) = GCN Korea and NATC

<sup>4)</sup> Summary of Project Activities for entire project period reported in Annual Report 2023 (8) = ECNU, TEID, KazBar, MACN, OECD, UNODC Global, UNODC Myanmar, WU Wien

<sup>5)</sup> Committed funds increased from USD 0,69 M to USD 0,89 M following Add-on Funding out of accumulated unspent funds from completed projects under the European Investment Bank settlement

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Global	-	2,86 M	activities in progress
	China	-	1,50 M	completed as of September 2022 <sup>3)</sup>
	China	0,80 M	-	completed as of September 2023 <sup>4)</sup>
	Indonesia	0,80 M	-	completed as of July 2022 <sup>2)</sup>
	Turkey	0,80 M	-	completed as of March 2023 <sup>4)</sup>
	Ivory Coast	0,80 M	-	activities in progress
	Global	1,70 M	-	activities in progress
	Argentina	0,80 M	-	activities in progress
	Korea	0,80 M	-	completed as of September 2022 <sup>3)</sup>
	Global	1,50 M	-	activities in progress
	Kazakhstan	0,80 M	-	completed as of August 2023 <sup>4)</sup>
	Nigeria	1,00 M	-	completed as of September 2023 <sup>4)</sup>

<sup>1)</sup> Transfer from Business for Social Responsibility (BSR) to Maritime Anti-Corruption Network (MACN) effective April 1, 2021

<sup>2)</sup> Mutual Agreement for Termination with East West Centre (EWC) reached on August 11, 2022 after new strategic directions of EWC are no longer a perfect match with the objectives of the Project. Summary of Project Activities for entire project period reported in Annual Report 2022 (1) = EWC

<sup>3)</sup> Summary of Project Activities for entire project period reported in Annual Report 2022 (2) = GCN Korea and NATC

<sup>4)</sup> Summary of Project Activities for entire project period reported in Annual Report 2023 (8) = ECNU, TEID, KazBar, MACN, OECD, UNODC Global, UNODC Myanmar, WU Wien

<sup>5)</sup> Committed funds increased from USD 0,69 M to USD 0,89 M following Add-on Funding out of accumulated unspent funds from completed projects under the European Investment Bank settlement

## Integrity Partner

Organisation for Economic Co-operation and Development (OECD), France

The Ethics Institute, South Africa

The Ethics Institute, South Africa

The Polish Chamber of Commerce of Medical Devices (POLMED), Poland

Transparency International Bulgaria, Bulgaria

United Nations Office on Drugs and Crime (UNODC), Austria

United Nations Office on Drugs and Crime (UNODC), Austria

United Nations Office on Drugs and Crime (UNODC), Austria

United Nations Office on Drugs and Crime (UNODC), Austria

Wirtschaftsuniversität Wien (WU), Vienna University of Economics and Business, Austria

## Total funding volume in USD

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Regional – Bosnia and Herzegovina, Croatia and Serbia	-	1,70 M	completed as of December 2022 <sup>4)</sup>
	Mozambique	0,80 M	-	activities in progress
	South Africa	1,00 M	-	activities in progress
	Poland	-	0,89 M <sup>5)</sup>	activities in progress
	Bulgaria	-	0,75 M	activities in progress
	Colombia	1,10 M	-	activities in progress
	Global - with focus on Kenya, Mexico, Pakistan	1,00 M	-	completed as of September 2023 <sup>4)</sup>
	Myanmar	0,80 M	-	completed as of September 2023 <sup>4)</sup>
	Regional – Egypt, Iraq, Libya and UAE	2,40 M	-	activities in progress
	Regional – Ghana, Kenya, Nigeria, Rwanda, South Africa, Uganda, Zambia	0,80 M	-	completed as of September 2023 <sup>4)</sup>
		17,70 M	7,70 M	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 25,4 M for the Third Funding Round.

## List of projects funded under the Golden Stretch Funding Round

Integrity Partner
Basel Institute on Governance, Switzerland
Foundation for the Global Compact, USA
International Anti-Corruption Academy (IACA), Austria
Maritime Anti-Corruption Network (MACN), Denmark
Organisation for Economic Co-operation and Development (OECD), France
Transparency International e.V., Germany
United Nations Office on Drugs and Crime (UNODC), Austria
Wirtschaftsuniversität Wien (WU), Vienna University of Economics and Business, Austria
<b>Total funding volume in USD</b>

<sup>1)</sup> Committed funds increased from USD 2,00 M to USD 2,17 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

<sup>2)</sup> Committed funds increased from USD 4,00 M to USD 4,50 M following Add-on Funding out of accumulated unspent funds from completed projects under the World Bank settlement

	Country of Implementation	Total Funding Volume under the World Bank Group settlement in USD	Total Funding Volume under the European Investment Bank settlement in USD	Project Status
	Global	3,50 M	-	activities in progress
	Global – with focus on Argentina, Bangladesh, Brazil, Egypt, India, Indonesia, Kenya, Malaysia, Thailand, and Ukraine	4,00 M	-	activities in progress
	Global	2,17 M <sup>1)</sup>	-	activities in progress
	Regional – Bangladesh, India and Pakistan	2,00 M	-	activities in progress
	Global – with focus on Algeria, Croatia, Saudi Arabia, Serbia, South Africa, Uzbekistan	3,00 M	-	activities in progress
	Global – with focus on Argentina, Romania, and Spain	1,00 M	-	activities in progress
	Global – with focus on Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia, Uzbekistan	4,50 M <sup>2)</sup>	-	activities in progress
	Regional - Ghana, Kenya, Nigeria, Rwanda, South Africa, Uganda, Zambia and selected Belt and Road Initiative countries	1,00 M	-	activities in progress
		21,17 M	-	

Due to rounding differences, the figures as presented in the table above may not add up exactly to the total Funding Amount of USD 21,17 M for the Golden Stretch Funding Round.

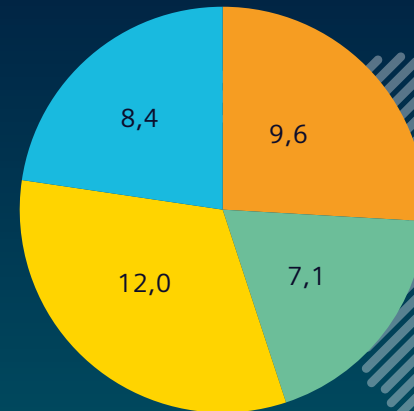
# B.

## Siemens Integrity Initiative

Siemens Integrity Initiative covers all major growth regions and high-risk countries with 85 projects and a total committed funding of ~ USD 120 M

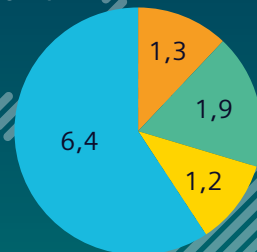
The chart illustrates the regional spread and balance of the First, Second, Third and Golden Stretch Funding portfolio

### Global Projects



37,1 M  
19 Projects with activities in many countries and 28 Golden Stretch country modules

### Americas



10,8 M  
7 Projects, 3 sub-projects 5 country modules

#### Region/Country of implementation (number of project proposals)

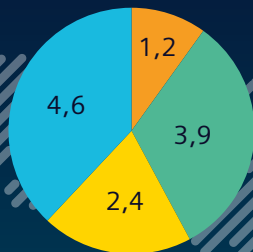
○ Bubble size = Approximate value of funding

- First Funding Round
- Second Funding Round
- Third Funding Round
- Golden Stretch Funding Round

**Note:** Schematic illustration only.  
Country Modules estimates vary depending on budget structure.  
Due to rounding, numbers presented may not add up precisely to the totals provided. Status: October 1, 2021



## Central & Eastern Europe



12,1 M  
10 Projects  
3 country modules

## Kazakhstan



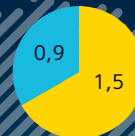
0,8 M  
1 Project

## Uzbekistan



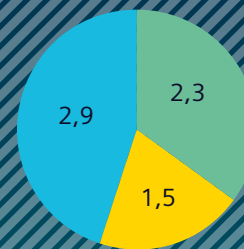
0,7 M  
2 country modules

## Russia



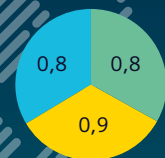
2,4 M  
1 Project  
1 sub-project

## China



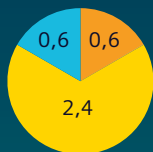
6,7 M  
5 Projects  
1 sub-project

## South Korea



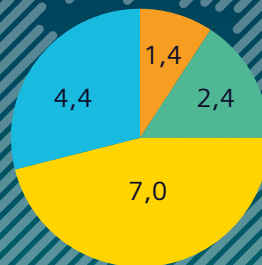
2,5 M  
3 Projects

## Southern Europe



3,6 M  
3 Projects  
2 country modules

## Middle East



15,2 M  
10 Projects,  
1 sub-project  
4 country modules

## Pakistan



0,3 M  
1 country module

## Myanmar



0,8 M  
1 Project

## Bangladesh



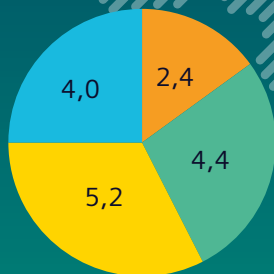
0,6 M  
2 country modules

## India



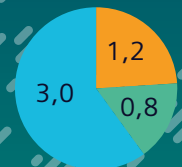
4,8 M  
3 Projects,  
3 sub-projects  
1 country module

## Africa



16,0 M  
14 Projects,  
3 sub-projects  
4 country modules

## Asia-Pacific



5,0 M  
4 Projects  
4 country modules



- Project profiles and highlights of activities in 2023

# Project profiles and highlights of activities in 2023

The following pages contain project objectives and funding volumes as agreed with Integrity Partners in the respective funding agreements.

For ongoing projects under the Third Funding Round and Golden Stretch Funding Round the descriptions of activities undertaken in this year (2023) were provided by the Integrity Partners in their respective Annual Progress Report 2023 and approved by the relevant Integrity Partners for external use.

Integrity Partners submitted the following documentation, which was the basis for the review of progress:

- Annual Progress Report, which provides an overview of activities undertaken and an assessment of progress made
- Annual Financial Report, which shows the utilization of funds per activity in comparison to the original budget set in the Funding Agreement
- Audit Statement by an external audit company, which verifies the financial report and provides an unqualified audit opinion on the use of funds
- Updated Work Plan and Updated Budget for 2024 where relevant

For Integrity Partners in the First, Second and Third Funding Rounds that have completed their activities, a Final Report including the following information was provided and used as the basis for review:

- Final Progress Report, which provides an overview of activities undertaken and an assessment of progress made
- Final Financial Report, which shows the utilization of funds per activity in comparison to the original budget set in the Funding Agreement
- Audit Statement by an external audit company, which verifies the financial report and provides an unqualified audit opinion on the use of funds



- Payment and expense overview
- External evaluation of impact

All **31** Siemens Integrity Initiative **First Funding Round** projects were completed by March 3, 2017. Key activities over the entire project period were reported on in one of our previous Annual Reports and therefore no First Funding Round Projects are included in this Annual Report.

To obtain information on the thirty-one (**31**) fully completed projects please refer to the previous Annual Reports 2012, 2013, 2014, 2015, 2016 and 2017 of the Siemens Integrity Initiative.

The respective projects are: Basel Institute on Governance, Beijing New Century Academy on Transnational Corporations (NATC) I, Central European University (CEU), COCIR, Convention on Business Integrity (CBI), Federation of Korean Industries-International Management Institute (FKI-IMI), Foundation for the Global Compact (UN PRME), Foundation for the Global Compact (UNGC / 5 countries), Fundación Universidad de San Andrés (FUdeSA), Humboldt Viadrina School of Governance, International Anti-Corruption Academy (IACA), Austria, International Business Leaders Forum (IBLF), Instituto Ethos – Ethos Institute for Business and Social Responsibility, Brazil, Maala Business for

Social Responsibility, Israel, Makati Business Club (MBC), Organisation for Economic Co-operation and Development (OECD) – MENA, Oživení, Partnership for Governance Reform (PGR) – Kemitraan, The Polish Chamber of Commerce of Medical Devices (Polmed) I, Sequa, Transparency International Bulgaria, Transparency International Italy, The Ethics Institute, South Africa, Transparency International Mexico, Transparency International USA, United Nations Development Programme (UNDP), University of Cairo, three UNODC I projects, and VCCI.



## • Project profiles and highlights of activities in 2023

All **24** Siemens Integrity Initiative **Second Funding Round** projects have completed their activities by March 2, 2021.

Information on key activities over the entire project period for the **24** projects were already reported in the Annual Report 2017 (2 projects), Annual Report 2018 (10 projects), Annual Report 2019 (10 Projects) and Annual Report 2020 (2 projects).

The respective projects are: Al Akhawayn University in Ifrane (AUI), Basel Institute on Governance, Beijing New Century Academy on Transnational Corporations (NATC), Confederation of Indian Industry (CII), Etik ve Itibar Dernegi

(TEID), Foundation for the Global Compact, Global Compact Network India (GCNI), Global Compact Network Korea (GCNK), International Anti-Corruption Academy (IACA), MedTech Europe, Organisation for Economic Co-operation and Development (OECD) Morocco project, Organisation for Economic Co-operation and Development (OECD) Russia project, Pan African Lawyers Union (PALU), Pearl Initiative (PEARL), The Ethics Institute (TEI) Mozambique project, The Ethics Institute (TEI) South Africa project, The Polish Chamber of Commerce of Medical Devices (POLMED), Transparency International Secretariat (TI-S), Transparency International España (TI-España), Transparency



International Italia (TI-It), United Nations Office on Drugs and Crime (UNODC), United Nations Development Programme (UNDP) Egypt, Morocco and Tunisia project, United Nations Development Programme (UNDP) Iraq and Libya project and Wirtschaftsuniversität Wien (WU Wien).

Further information is provided on [www.siemens.com/integrity-initiative](https://www.siemens.com/integrity-initiative).

**11** Siemens Integrity Initiative Third Funding Round Projects completed their activities by March 1, 2024.

Information on key activities over the entire project period for 3 projects were already reported in the Annual Report 2022. The respective projects are the Beijing New Century Academy on Transnational Corporations (NATC), the East-West Center (EWC), and the Global Compact Network Korea (GCNK).

In this Annual Report 2023, information on key activities over the entire project period for the **8** projects is included, namely the East China Normal University (ECNU), Etik ve İtibar Derneği (TEID), the Kazakhstan Bar Association (KazBar), the Maritime Anti-Corruption Network (MACN), the Organisation for Economic Co-operation and Development (OECD), the United

Nations Office on Drugs and Crime (UNODC) Global Integrity Education, the United Nations Office on Drugs and Crime (UNODC) Myanmar and Wirtschaftsuniversität Wien (WU Wien).

For all projects the Project Profiles in Section C were provided by the Integrity Partners and approved by them for external use.

# C1.

## First Funding Round Projects: Project profiles and highlights of activities up to 2017

For projects under the First Funding Round the descriptions of activities undertaken over the entire project period were provided by the Integrity Partners in their respective Final Progress Reports and approved by the relevant Integrity Partners for external use.

All 31 First Funding Round projects have been fully completed and reported on in the Annual Reports of 2011, 2012, 2013, 2014, 2015, 2016 and 2017.

No First Funding Round projects are covered in this Section C1.





# C2.

## Second Funding Round Projects: Project Profiles and highlights of activities up to 2020

For projects under the Second Funding Round the descriptions of activities undertaken over the entire project period were provided by the Integrity Partners in their respective Final Progress Report and approved by the relevant Integrity Partners for external use.

All 24 Second Funding Round projects have been fully completed and reported on in the Annual Reports of 2017 (2 projects), 2018 (10 projects), 2019 (10 projects) and 2020 (2 projects).

No Second Funding Round projects are covered in this Section C2.



# C3.

## Third Funding Round Projects: Project Profiles and highlights of activities in 2023

For the projects under the Third Funding Round the descriptions of activities undertaken in 2023 were provided by the Integrity Partners in their respective Annual or Final Progress Report 2023 and are approved by the relevant Integrity Partners for external use.

Of the 22 Third Funding Round projects, 11 projects have completed their activities, of which 3 completed projects were reported on in Annual Report 2022 and 8 completed projects are reported on in this Annual Report 2023.

11 projects remain active with implementation of activities still in progress.



## DESCRIPTION OF INTEGRITY PARTNER

Established in 2003, the **Basel Institute on Governance** is an independent and international non-profit organisation working around the world with public and private partners to prevent and combat corruption and strengthen governance.

- The Private Sector team takes a dual approach to engaging and strengthening the private-sector response to corruption risks in business transactions by advancing anti-corruption Collective Action and through advice and technical assistance to private corporations and state-owned enterprises. It hosts the **B20 Collective Action Hub**
- The International Centre for Asset Recovery (ICAR) at the Institute works with countries around the world to strengthen their capacities to recover illicit assets
- The Green Corruption programme is a multi-disciplinary initiative that targets environmental degradation using anti-corruption and governance tools
- The Prevention, Research and Innovation (formerly Public Governance) team connects corruption research with anti-corruption practice

Name of Integrity Partner:

## Basel Institute on Governance in cooperation with the Organisation for Economic Co-operation and Development

PROJECT:

### Positioning Collective Action as a Compliance Norm

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

Global

5 years

2,86 M

Switzerland

This project implemented by the Basel Institute on Governance and the Organisation for Economic Co-operation and Development aims to embed Collective Action in compliance by developing a global norm, bolstering its application, and innovating Collective Action to address demand-side bribery and human rights synergies through three objectives.

First, the project seeks to position Collective Action as a norm by key standard-setting and enforcement institutions. Through strategic awareness-raising and advocacy, the project will encourage targeted institutions to create stronger incentives for more private sector and other actors to engage in Collective Action.

Second, it will equip compliance professionals and Collective Action practitioners with effective methodologies for launching and sustaining Collective Action initiatives through peer-learning and best-practice sharing.

Third, the project will generate innovation in anti-corruption Collective Action in two areas. To generate knowledge and build trust in Collective Action as a tool to combat bribery, and by leveraging synergies between corruption prevention and human rights protection to achieve efficiencies in compliance practices.

#### PROJECT AT A GLANCE:

To embed Collective Action in compliance by developing a global norm, bolstering its application, and innovating to address demand-side bribery and human rights synergies

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- Contributed to the inclusion of Collective Action as a recommended approach in the updated version of the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) and the [Infrastructure Anti-Corruption Toolbox](#)
- Co-chaired the [Integrity and Compliance Task Force at the B20 Indonesia](#) for the year 2022, and appointed as [Network and Knowledge Partner for the 2023 B20 India ESG Action Council](#). Both led to the inclusion of Collective Action in policy documents

- Achieved a 20% increase in the use of the [B20 Collective Action Hub](#) and continued to grow the number of initiatives and publications available to users
- Hosted a [virtual panel discussion](#) building on insights from the 2022 International Collective Action Conference and Awards
- Led a panel at the [Civil Society Policy Forum of World Bank Group Annual Meetings](#) on Collective Action and SMEs as drivers for fair business and presented at the [2022 International Anti-Corruption Conference](#)
- Built further knowledge on the synergies between anti-corruption compliance, business and human rights through a research partnership with Professor Anita Ramasastry from the University of Washington

#### Impact

The Basel Institute has widened the scope and broadened the reach of Collective Action in different regions and sectors by:

- Continuing to raise awareness of, and generate buy-in for, Collective Action globally, especially among policy-setting and enforcement institutions
- Responding to a growing demand – over 30 in total in the current reporting period – to host and participate in meetings, events and conferences internationally with even more opportunities to create awareness of and support for Collective Action globally
- Supporting key stakeholders interested in undertaking Collective Action by developing and disseminating knowledge products and providing technical assistance
- Building networks and bolstering learning among likeminded organisations actively engaged in Collective Action by facilitating communication and knowledge exchange
- Advancing knowledge on the synergies between anti-corruption compliance, business and human rights through research and public outreach

## DESCRIPTION OF INTEGRITY PARTNER

Founded in Shanghai in October 1951, the **East China Normal University** (ECNU) is one of the most prestigious universities in China and is sponsored by the national programs "Project 211" and "Project 985". ECNU offers doctoral programs in 30 of its first-level disciplines and master's programs in 37 first-level disciplines and is authorized to confer 20 professional master's degrees and doctoral degree in education. The university sponsors or supervises the publication of 23 academic journals and periodicals, as well as four English-language academic journals.

The Research Center for Corporate Compliance (RCCC) of ECNU is the first non-profit research organization in China that provides platforms for researchers, compliance practitioners and policymakers to communicate. The orientation of the research center is to achieve the combination of the research on law and other fields with close practices of compliance and to train people so that they become experts on corporate compliance.

Name of Integrity Partner:

## East China Normal University

## PROJECT:

### Great China Compliance

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

China

3 years

0,80 M

China

The project seeks to develop a compliance education program for college students and professionals. Companies and universities will be able to benefit from our project and its positive outcomes.

Furthermore, group work on compliance R & D and annual meetings for Collective Action will be launched as one aspect of the project.

The project will be divided in two parts. The first part covers the compliance education program. The higher education of corporate compliance will be integrated as a subject in the system of higher education.

A short-term Corporate Compliance Program will be launched as a simple version of compliance education for students and professionals (one step at a time from the city of Shanghai to the region of Shanghai, and then countrywide).

The second part of the program refers to Collective Action in the form of publications, working groups, and annual meetings. These activities seek to share compliance knowledge and techniques.

An annual meeting of the healthcare sector in Shanghai will be planned to summarize the healthcare compliance development.

At the end of the project, the standards of corporate compliance higher education will be established, the first experiences of which will have been undertaken; thus, the compliance awareness and compliance techniques of compliance professionals in the healthcare sector in China will be enhanced.





#### PROJECT AT A GLANCE:

The project will address the lack of higher education for compliance professionals and promote Collective Action Initiatives in the healthcare sector to raise skills and competence of compliance professionals, improve compliance standards and reduce corruption

#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JANUARY 2020 – SEPTEMBER 2023):

The Great China Compliance project has promoted compliance higher education and prepared China's next generation of professionals by:

- Designing a curriculum of compliance higher education and publishing a [book on curriculum programs](#)
- Providing [compliance education programs](#) for 423 students from 18 different universities and issuing 270 compliance certificates. The programs offer over 10 courses covering comprehensive compliance and various integrity topics
- Providing [compliance training programs](#) for 658 participants, 407 of whom received compliance certificates
- Publishing [The Great China Compliance Series](#) (8 compliance handbooks and monographs) with over 20 000 copies circulated
- Launching a total of 13 [advanced studies on corporate compliance and anti-corruption compliance](#)
- Organizing 3 compliance [annual meetings in Shanghai](#) and engaging over 370 professionals and stakeholders
- Setting [standards for compliance management systems of SMEs, tax compliance, and work safety compliance](#), and together with procuratorates, initiating or publishing a total of 26 compliance guidelines covering anti-corruption, taxation, environmental protection, data protection, intellectual property and the healthcare sector
- Establishing [the Shanghai Research Base on Criminal Compliance and Monitorships](#) as part of the [Connecting University and Procuratorate Integrity Pact](#) aimed at fighting corruption and financial crimes
- Establishing [the Chinese University Compliance Alliance](#) to promote compliance higher education and compliance research. A total of 33 organizations, mainly universities, are registered as alliance members

#### Impact

- The project has firmly established, and will continue to expand, compliance higher education in China thereby enhancing the compliance competence and ethical awareness of young talents and improving the integrity and sustainability of business practices in the healthcare sector
- Compliance standards, guidelines and measures are widely communicated and used, and are regarded by government authorities as effective in risk mitigation
- Various compliance related [legislation and regulations](#) such as the Guidelines on Anti-Bribery Compliance have been promulgated

## DESCRIPTION OF INTEGRITY PARTNER

The **Ethics and Reputation Society** (Etik ve İtibar Derneği – TEID) is a not-for-profit NGO founded in 2010 with competence in integrity risk management and anti-corruption aiming to develop and encourage adherence to internationally recognized business ethics principles within the Turkish business environment. TEID acts as a point of reference for private sector companies to implement the principles of business ethics and with the public sector in the pursuit of a socio-economic environment that incentivizes compliance with these principles.

TEID has over 200 corporate members with a total yearly income exceeding 15% of Turkey's GDP, employing more than 800.000 persons.

All corporate members are signatory of TEID Integrity Pledge, which is Turkey's biggest cross-sectoral Collective Action initiative. TEID has also several roles and memberships in international anti-corruption initiatives.

Name of Integrity Partner:

## Etik ve İtibar Derneği – TEID

## PROJECT:

### Leveling the Playing Field with the Turkish Integrity Center of Excellence - TICE

COUNTRY OF IMPLEMENTATION:

Turkey

DURATION:

3 years

USD (MILLION):

0,80 M

REGISTERED IN:

Turkey

Since 2014, the Turkish Integrity Center of Excellence (TICE) has been working on elevating the awareness on corruption effects and developing tools to combat corruption in the private sector while also setting an example for the public sector with its content development and capacity building activities.

With this project at hand, TICE aims now to take its efforts to the next level and elevate the integrity risk management abilities of local companies to match the high "extended enterprise integrity risk management" standards of multinational companies. TICE will contribute with two specific objectives:

1. provide practical solutions that transform companies' intent into impact by leveraging behavioral and institutional dimensions of integrity to therefore be in better accord with the extended enterprise integrity risk management priorities of Multi-National Companies (MNCs)
2. develop Collective Action to disseminate and incentivize standardized sustainable and responsible business conduct by building alliances against corruption

TICE's priority is to reach out to local companies in selected sectors and cities. Large companies and MNCs operating in Turkey will play a leveraging role to help their supplier Small and Medium Enterprises (SMEs) to establish their own anti-corruption compliance program.

#### PROJECT AT A GLANCE:

To level the playing field by increasing the extended enterprise risk management capabilities of multi-national corporations (MNCs) and local conglomerates by building alliances against corruption

#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – MARCH 2023):

- In the project's 1<sup>st</sup> cross-sector Collective Action initiative, a total of 228 corporate members have signed the [TEİD corporate members Integrity Pledge](#). This represents an increase of 84 new members since project start and includes 25 companies from the Istanbul Chamber of Industry's Top 500 companies (ISO 500)
- In the project's 2<sup>nd</sup> cross-sector Collective Action initiative, a top-down approach driven by the Federation of Sectoral Associations (SEDEFED) which represents over 45 sectoral associations resulted in the signing of the [Ethical Declaration on Business Ethics Principles](#)
- Business Integrity Principles were disseminated through 2 sector specific Collective Action initiatives, the first being with the Türk Armatörler

Birliği (Turkish Shipowners Association) resulting in signatories to the [Turkish Shipowners' Ethics Principles](#), and the second being the [Responsible Miners Initiative](#) with the Türkiye Madenciler Derneği (Turkish Miners Association – TMD) resulting in a publication covering Business Ethics & Transparency, Health & Safety, Nature & Ecosystem and Social Dialogue and local development

- Knowledge sharing and capacity building activities in 172 online and in-person events reached 14 431 attendees from 7 787 companies in total, including 1 176 ISO 500 companies, 1 002 industry sector companies and 1 297 healthcare sector companies. Video recordings on the [TEİD YouTube channel](#) vastly extended the outreach to different geographical regions in Turkey
- 8 online editions of the TEİD Academy Corporate Ethics and Compliance Management Certification Program (ECP) reached 260 participants from 134 companies including 62 participants from ISO 500 companies, 11 companies from the healthcare sector and 92 companies from the industry sector
- The focus on Youth through 12 awareness raising events on business ethics reached 607 students, and 1 edition of the "TEİD Academy Next Gen" reach a further 25 graduates from various universities

- TEİD contributed to the publication and release of guidance relating to Ethics and Compliance Manager qualifications under national and international vocational standards for recognition of the profession
- Various knowledge and outreach products were published such as 14 [INmagazine](#) editions, 3 [books](#), 4 [guides](#), 2 [assessment tools](#), and 3 [research and survey publications](#)

#### Impact

- TEİD's cross sector and sector specific Collective Action initiatives have contributed to increased awareness of and commitment to responsible business practices in many Turkish companies, and has increased the number of ISO 500 companies that have introduced new or revised responsible business codes of ethics or anti-corruption policies
- TEİD's certification of well over 420 ethics and compliance professionals has raised the knowledge, skills and qualifications of practitioners which in the medium to long term will enable an improved responsible business culture and a leveled playing field to the benefit of all market participants

## DESCRIPTION OF INTEGRITY PARTNER

The **European Chamber of Commerce** (Eurocham) in Ivory Coast (IC) was created in 2009 at the initiative of businesspeople and leaders, mostly companies and multinational groups established in Côte d'Ivoire.

The main activities of Eurocham aim at the following objectives:

- Representing the European business community in the Republic of Ivory Coast vis-à-vis the public authorities, corporate organizations and European bodies
- Facilitating the development of business activities originating from European countries
- Promoting industrial and commercial exchanges between the EU and the IC as well as European investments in IC
- Contributing to the improvement of the business climate and the use of good practices through constructive dialogue with the Ivorian authorities, in collaboration with other consular chambers and professional organizations
- Contributing to the economic integration of the sub region, the West African Monetary and Economic Union (UEMOA) and the Economic Community of West African States (ECOWAS), in terms of trade and free movement of goods and services and sustainable development
- Being a source of information and networking for member companies
- Providing technical and practical services to its members
- Carrying out concrete actions of advocacy and lobbying in support and defense of the interests of its members, as part of their specific common concerns

Name of Integrity Partner:

## Eurocham (Chambre de Commerce Européenne en Côte d'Ivoire)

## PROJECT:

### African Certification of Corporate Governance

COUNTRY OF IMPLEMENTATION:

Ivory Coast

DURATION:

5 years

USD (MILLION):

0,80 M

REGISTERED IN:

Ivory Coast

This project aims to support the efforts of the Ivorian Government and specialized agencies by encouraging and providing support to Small and Medium Enterprises (SMEs) in the implementation of good corporate governance measures.

The first objective of this project is to raise awareness about the importance and benefits of implementing good corporate governance measures. Examples of good practices and ways to implement these practices will be presented to participating SMEs through a year-long training scheme and the dissemination of a monthly newsletter.

The second objective, after the training period, aims to provide support to 60 SMEs for three years. During this time, at least three good corporate governance measures will be implemented in each SME (one per year) with the help and support of an Expert Consultant.

At the end of the three years, by March 2024, all SMEs who have successfully implemented at least three good corporate governance measures will receive the Certificate of Good Governance.

This certificate will serve as a competitive and commercial advantage for SMEs. The certification will be guaranteed by the private sector itself through the promotion of the Certificate to Eurocham's members and partners.

#### PROJECT AT A GLANCE:

Encouraging the implementation of at least three good corporate governance measures by SMEs through the attribution of a Good Governance Certification

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- 60 SMEs were selected for participation in the [African Certification of Corporate Governance](#) (ACCG) program. The selected SMEs as a first measure signed a commitment charter to fight corruption and promote good governance, and then committed to implement a further two entity specific good governance and anti-corruption measures
- 2 four-day workshops were held to support the implementation and review of various entity specific proposals including measures that either:
  - promote a culture of commitment to good governance including transparency in the recruitment process
  - cover responsible financial decision-making and strategic cost control
  - deal with risk governance and internal controls
  - cover disclosure and transparency
  - relate to shareholder participation
- 3 short [entrepreneurial films](#) encouraging SMEs to implement anti-corruptions measures were produced and distributed to over 200 EUROCHAM network member companies
- The ACCG team participated at the [International Corruption Hunters Alliance 2023](#) forum on 14 to 16 June 2023 convened in Abidjan by the World Bank as well as an official meeting with the Basel Institute of Governance and the Ivorian Minister for the Promotion of Good Governance

#### Impact

- The ACCG project has increased the capacity of companies to integrate anti-corruption measures, directly and/or indirectly resulting in the financial certification of more than 5 companies, the creation of 7 internal governance positions as well as the motivation to reform management oversight in 23 companies
- The project's visibility and impact is evidenced by ACCG's participation in events such as the International Corruption Hunters Alliance 2023 forum and the subsequent engagement in ministerial meetings
- The project has stimulated the interest of the European Union delegation in Côte d'Ivoire to jointly develop with Eurocham a follow-on project that would expand on the current results by integrating the targeted companies into a potential follow-on program

## DESCRIPTION OF INTEGRITY PARTNER

The **Foundation for the Global Compact** was established in 2006 and registered as a 501(c) (3) non-profit organization under New York State law. The Foundation is based on the principle that transparency, integrity and public-private collaboration is essential to finding lasting solutions to pressing global problems.

The Foundation supports the activities of the **United Nations Global Compact** including fundraising, outreach and engagement with business stakeholders. This is a policy and engagement platform for businesses that are committed to aligning their operations and strategies with the Global Compact's ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption.

Name of Integrity Partner:

## Foundation for the Global Compact

## PROJECT:

### Scaling up Anti-Corruption Collective Action within Global Compact Local Networks

COUNTRY OF IMPLEMENTATION:

DURATION:

USD (MILLION):

REGISTERED IN:

Global

4 years

1,70 M

USA

The project titled "Scaling up Anti-Corruption Collective Action within Global Compact Local Networks" aims to:

1. mainstream Collective Action and enhance its understanding and implementation locally
2. mobilize multi-stakeholder efforts to identify and develop plans to address corruption challenges within a country/sector, and
3. engage with governments and other stakeholders to enhance public-private cooperation in fighting corruption

To this end, the project will adopt a three-pronged approach:

1. development of an Anti-Corruption Collective Action Playbook for Global Compact Local Network(s) (GCLN) to mainstream the understanding and uptake of Collective Action

2. global launch and roll-out of the Playbook to enable Local Networks in understanding and using the Collective Action methodology to identify and address corruption issues
3. support select GCLNs in their Collective Action initiatives. Underlying this approach will be an overarching goal of facilitating public-private cooperation on Collective Action through policy dialogue and engagement with governments and non-business stakeholders

The project will endeavor to mainstream Anti-Corruption Collective Action and enable GCLNs to engage the private sector and other stakeholders in understanding, initiating and supporting Collective Action.



#### PROJECT AT A GLANCE:

To enable Local Networks to engage the private sector and other stakeholders in Anti-Corruption Collective Action and to facilitate public-private cooperation through policy dialogue and engagement with governments and non-business stakeholders

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

The Global Compact Office in New York prioritized its focus on mainstreaming Collective Action into key United Nations initiatives by:

- incorporating Collective Action into a [Call-to-Action](#) from Business to Governments submitted at the [Conference of the States Parties to the UN Convention against Corruption](#), where the United Nations guidelines for States to strengthen corporate integrity, including through Collective Action, were presented
- promoting Collective Action and its [e-course](#) at the UN Global Compact [Leaders Summit](#) represented by 70 countries and at the

Annual Local Network Forum to participants from 60 countries

- embedding Collective Action in the new United Nations Global Compact Strategy and Business Integrity strategy as introduced at the Board Meeting chaired by the UN Secretary-General

Notable Global Compact Local Network accomplishments include:

- **GCN Brazil:** The Collective Action Initiative on Food & Agribusiness was adopted by [decree](#) as a criterion for the Ministry of Agriculture's national business integrity award. The High-Level Policy Dialogue attended by over 130 key stakeholders across sectors led to legislative [recommendations](#) on Whistleblower protection, asset recovery, ethical use of technology and lobbying
- **GCN India:** Multiple nationwide [campaigns](#) and capacity building activities were implemented reaching 1 200 participants from business, government, academia and hospitals to ensure coordinated engagement in tackling corruption in the health sector
- **GCN Kenya:** Private sector participation was secured in the development of the Anti-Bribery

Act procedures and [the 2023-2027 Kenya Integrity Plan](#). In addition, 62 more signatories were added to the [Kenya Ethics Code](#) with 500 leaders participating at the [Anti-Corruption Day event](#)

- **GCN Ukraine:** Outstanding efforts to promote "[business integrity in wartime](#)" include a [practical handbook](#), a high-level event leading to the [Memorandum of Joint Actions in Ukraine](#) signed by 50 companies, a video-course launched at its Anti-Corruption Week and the publication of an impactful article "Lessons of Business Integrity in Wartime: What collective efforts are needed in Ukraine to eradicate corruption?" with 1 500 reads in the first week

#### Impact

- Mainstreaming Collective Action into United Nations Global Compact key initiatives nearly doubled the number of Global Compact Networks using this approach in only six months
- The [Collective Action Playbook](#) has become a motivational reference to other Local Networks and has led to a further 8 non-project Local Networks developing Collective Action measures in Bolivia, Colombia, Georgia, Haiti, Paraguay, Poland, Sri Lanka and Uruguay



## DESCRIPTION OF INTEGRITY PARTNER

**Fundación Poder Ciudadano**, the Argentine chapter of Transparency International, has almost 30 years of experience leading the fight against corruption and promoting transparency in Argentina.

Our mission: to promote citizen participation, transparency and access to public information to strengthen the institutions of democracy through Collective Action.

Our "Integrity in the Private Sector" Program together with our expertise in public procurement, position us as a technical and legitimate voice to interact and mediate between the State and its suppliers in order to improve the integrity environment.

We are pioneers in working with Integrity Pacts and Multisector Integrity Agreements in the country, and recognized as a proactive organization aimed at promoting reform processes that uphold the principles of integrity, transparency and ethics in the state and business relationship.

Name of Integrity Partner:

## Fundación Poder Ciudadano

## PROJECT:

**Virtuous alliance: SMEs and public enterprises Co-creating environments of integrity for sustainable and inclusive growth**

COUNTRY OF IMPLEMENTATION:

**Argentina**

DURATION:

**3.5 years**

USD (MILLION):

**0,80 M**

REGISTERED IN:

**Argentina**

This proposal aims to contribute to the development of a virtuous alliance between Small and Medium Enterprises (SMEs) and Public Enterprises and will focus on the co-creation of integrity environments for sustainable and inclusive growth.

We propose

- 1) to raise awareness about the importance of integrity as a condition for improving the competitiveness of SMEs and public companies in the energy sector in Argentina
- 2) to strengthen SMEs and public companies, through the incorporation and elevation of compliance standards; and

- 3) to promote preferential public policies and regulations in order to improve SMEs participation in public procurements, such as decartelization mechanisms and fight against corruption

We will evaluate the levels of integrity of SMEs and public companies in the energy sector, allowing us to create a training and support system for SMEs that enables them to adapt their structures to current legal obligations and access to good practices and international standards in terms of compliance.

We will build a broad alliance between civil society, sector representatives and specialists to influence decision makers to generate preferential public policies and increase the participation of SMEs in public procurement processes and improve their competitiveness.



#### PROJECT AT A GLANCE:

To improve integrity environments in the State-Market relationship, strengthening SMEs and Public Enterprises in the energy sector, in Argentina

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- The “[Virtuous Alliances in Public Procurement](#)” event was held in April 2023. Over 50 participants from energy companies, civil society and government shared experiences, challenges and opportunities in promoting Integrity Programs among public and private sector suppliers
- [Training](#) for SMEs, SOEs and professionals in the energy sector was provided in 10 provinces of Argentina. Tools and experiences were shared with more than 145 people. The training was based on the Virtuous Circles Toolkits for [SMEs](#) and [SOEs](#)

- In July 2023, the [launch event](#) of the free online course “[Integrity Tools for SMEs and SOEs in the energy sector](#)” was held. This online course offers knowledge and tools for SMEs, cooperatives and SOEs to self-manage the implementation of Integrity Programs
- A [cycle of monthly dialogues](#) about integrity and transparency was launched in September 2023. 36 participants attended the first webinar to discuss the topic of risks analysis
- A strategic document was drafted to promote preferential public policies and regulations that take into account the ethics and compliance programs of SMEs in order to improve their participation in public procurement
- The “Virtuous Alliances” [project website](#) was officially [launched](#) in December 2022. The website platform provides project information, useful publications and free tools for SMEs, Cooperatives and SOEs such as the Virtuous Alliance Toolkits for [SMEs](#) and [SOEs](#)

#### Impact

- Virtuous Alliances is being recognized by stakeholders as a space for training, dialogue and the promotion of integrity in the energy sector
- SMEs, cooperatives and SOEs have increased their knowledge of business integrity and strengthened their capacity to prevent corruption in their businesses thanks to the training, courses and tools provided by the initiative
- Tools provided by the initiative are being used by companies and business associations to strengthen their value chain and member organizations

## DESCRIPTION OF INTEGRITY PARTNER

The **International Anti-Corruption Academy** (IACA) is an international organization and post-secondary educational institution. At present, it is comprised of 77 State Parties and 4 international organizations.

It is the only international organization with a mandate focused solely on fighting corruption through education, research, cooperation, and technical assistance delivery.

IACA strives to complement the United Nations' work in the field of sustainable development, including through project implementation and provision of technical assistance, and to facilitate the implementation of the United Nations Convention Against Corruption (UNCAC).

Its activities benefit public and private sector professionals and practitioners, academics, media professionals, and civil society.

The Academy currently offers four master's degree programmes, various capacity-building trainings, and technical assistance.

IACA also creates platforms for dialogue and networking on anti-corruption issues.

Name of Integrity Partner:

## International Anti-Corruption Academy

## PROJECT:

### "GEAR UP" to fight corruption

COUNTRY OF IMPLEMENTATION: DURATION:

Global

5 years

USD (MILLION):

1,50 M

REGISTERED IN:

Austria

Within the five years of the project, IACA will train and educate participants in its academic degree programmes, Summer Academy trainings at IACA, Regional Summer Academy (RSA) and Regional Alumni Conference.

Students and participants will be provided with a neutral platform for learning with innovative curricula in a unique, international, interdisciplinary, and inter-sectoral setting. Educational activities during academic studies, trainings as well as the RSA and Regional Alumni Conference, will include practice oriented techniques which will drive incremental change and impact, including compliance and AC labs, panels and roundtable debates, field trips, ethical dilemma trainings, simulation games, industry specific assessments, and Collective Action workshops.

World class practitioners and academics will be involved.

The RSA and the Regional Alumni Conference will be organized in parallel in Africa, in a region of high impact.

These two activities will contribute to increasing the anti-corruption and Collective Action initiatives in the region as well as to growing and strengthening the existing alumni network.

The project will place particular emphasis on enhancing the impact of participants' activities. For this purpose impact driven academic activities will be used together with incentives, and follow-up or monitoring mechanisms.

Building upon IACA's institutional strengths, the ultimate goal of the Project is to put theory and knowledge into practice with real impact.

#### PROJECT AT A GLANCE:

To empower professionals to fight corruption, improve compliance, pursue Collective Action initiatives, and strengthen the anti-corruption alumni network

#### KEY ACTIVITIES

##### (OCTOBER 2022 – SEPTEMBER 2023):

- [The International Anti-Corruption Summer Academy 2023](#) took place in person from June 10-16, 2023 with 56 participants from 28 countries. 5 full scholarships were awarded to qualified professionals from Least Developed Countries and Emerging Markets
- In the second academic year starting October 2022, final modules of [Master in Anti-Corruption \(MACS\)](#) 2021 and the [International Master in Anti-Corruption Compliance and Collective Action \(IMACC\)](#) 2021 were conducted online. Full and partial fee waiver scholarships were provided to 19 professionals from Least Developed Countries and Emerging Markets who are expected to graduate in December 2023
- The first 4 modules of MACS and IMACC 2022 were also conducted online, supporting 2 professionals from Least Developed Countries and Emerging Markets
- Both [Master in Anti-Corruption and Diplomacy \(MACD\)](#) scholarship holders successfully defended their theses in June 2023 and will graduate in December 2023. For MACD 2022, 1 partial fee waiver scholarship was awarded
- The Joint IACA – UNITAR [Executive Diploma in Anti-Corruption and Diplomacy](#) 2023 program, held online from March 6 to July 30, 2023 attracted 22 global participants. 10 tuition fee waivers were granted to applicants from Least Developed Countries and Emerging Markets

#### Impact

- Through IACA'S MACS, IMACC, MACD, Summer Academy and other programmes and short courses, the knowledge and skills of students and participants will be enhanced, leaving them well-placed and motivated to apply their new insights in innovative ways to prevent and combat corruption and to enable clean and stable business environments in their respective countries

## DESCRIPTION OF INTEGRITY PARTNER

The Chamber of Legal Consultants **"Kazakhstan Bar Association"** is a self-regulated organization established on the basis of compulsory membership for the purpose of regulating the activity to provide legal assistance and control over the activities of their members with respect to their compliance with the requirements of the legislation of the Republic of Kazakhstan on advocacy and legal assistance, rules and standards of the Chamber, the Code of Professional Ethics included in the Register of the chambers of legal consultants.

Name of Integrity Partner:

## Kazakhstan Bar Association in cooperation with the Legal Policy Research Centre

## PROJECT:

**Implementation of a systematic, structured and effective policy of improving business integrity and developing corporate governance in Kazakhstan according to OECD standards**

COUNTRY OF IMPLEMENTATION: DURATION:

Kazakhstan

3 years

USD (MILLION):

0,80 M

REGISTERED IN:

Kazakhstan

The Project activities are aimed at achieving 2 objectives:

1. Creating an enabling favorable legal environment and implementing international anti-corruption obligations by encouraging the Government to incorporate international anti-corruption standards into the laws of Kazakhstan by amending certain provisions of its anti-corruption legislation
2. Promoting international anti-corruption standards and clean business practices in corporate and academic circles by bringing draft amendments before the Government to introduce additional legislative requirements for companies to develop, adopt and implement anti-corruption standards and internal control, ethics and compliance systems

Representatives of the private sector, public administration, academia and students will be trained through online and offline project training.

Findings made as a result of diagnostics and OECD reporting will be used for promotional materials on the implementation of anti-corruption standards in business, the development of a culture of integrity and ethics and compliance in business.

Owing to the project, 40% of companies in piloted sectors will implement and actively use a complete and high-quality compliance system.

#### PROJECT AT A GLANCE:

The project goal is to reduce the level of corruption in Kazakhstan by implementing a systematic, structured and effective policy of improving business integrity and developing corporate governance according to OECD standards

#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JANUARY 2020 – AUGUST 2023):

- The Project initiated a number of large-scale discussions on anti-corruption policy and the development of anti-corruption compliance in Kazakhstan. A [Forum](#) with 585 participants and a [National Conference](#) with 369 representatives from state authorities, business, academia and the expert community were convened
- 2 networking meetings were also held with civil society representatives to discuss ongoing cooperation on alternative reporting under the [OECD Istanbul Action Plan against Corruption](#)
- 3 reports promoting recommendations for Kazakhstani legislation and practice out of the OECD Istanbul Action Plan were prepared
- 29 companies benefited from recommendations for implementing compliance systems based on their company specific diagnostic results
- Online courses for entrepreneurs and representatives of medium and large enterprises were presented in [Russian](#) and [Kazakh](#).
- 138 specialists completed the courses and received certificates of completion
- 888 representatives of government agencies, businesses and universities of Kazakhstan were trained in compliance culture within the framework of all the project training initiatives
- 6 interactive training programs consisting of 22 modules were presented for different audiences on a single virtual [platform](#). Around 90 participants have already completed the modules

#### Impact

- A number of recommendations were included in the [Concept of Anti-Corruption Policy until 2026](#) which leaves a longer-term impact potential for legal policy reform and implementation from 2023 to 2026, well beyond the completion of scheduled project activities
- The Project has contributed to standard-setting which has resulted in the adoption of amendments aimed at developing compliance functions in the quasi-state-owned sector
- The Project has also significantly contributed to the introduction of whistleblower protection legislation in Kazakhstan

## DESCRIPTION OF INTEGRITY PARTNER

The **Maritime Anti-Corruption Network (MACN)** is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

Established in 2011, MACN is comprised of companies within the main sectors of the maritime industry. With over 180 companies from the maritime industry represented, MACN members own or manage over 50 percent of the total global tonnage in the maritime industry.

Since its inception, MACN has become one of the preeminent examples of an industry led Collective Action network.

Name of Integrity Partner:

## Maritime Anti-Corruption Network (MACN) in cooperation with the Convention on Business Integrity

## PROJECT:

### MACN Nigeria - Business Action Against Corruption (BAAC)

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

Nigeria

3 years

1,00 M

Denmark

This project will scale-up the Maritime Anti-Corruption Network's (MACN) Collective Action program in Nigeria, with the aim of improving efficiency of seaports and terminals services in Nigeria and enabling effective corruption prevention through improved compliance and create a culture of integrity.

The project will lead to clean business and fair market conditions for seaports and terminals users in Nigeria, by enabling stronger business Collective Action amongst port users in Nigeria, stronger government compliance environment, proving public-private arrangements for oversight of compliance.

The project will be facilitated over three years by MACN and The Convention on Business Integrity (CBI). Through this new project we are expanding to multiple agencies and port users, enabling inter-industry and public-private sector dialogue on integrity issues, and equipping local players with proven Collective Action methodologies to drive change.



#### PROJECT AT A GLANCE:

To establish more effective seaports and terminals services in Nigeria and adopt corruption prevention practices via improved compliance with Standard Operating Procedures

#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (JANUARY 2020 – SEPTEMBER 2023):

- The project secured collaboration with civil society, the [Center for International Private Enterprise](#), the [Lagos Chamber of Commerce and Industry](#) and the [National Seafarer's Welfare Board and Seafarers Assistance Network](#)
- An Integrity Alliance with over 273 port users was established and port specific Steering Committees were elected
- A [series of events](#) for the Integrity Alliance and Executive Committees were held in both Eastern and Western ports of Nigeria
- A series of [Compliance Roundtables](#) chaired by the [Federal Ministry of Transport](#) were

held to strengthen an evidence-driven compliance framework for government agencies

- A Port Standing Task Team was introduced and complemented with a stronger compliance function in each agency in each location of ports and terminals
- The [Independent Corrupt Practices and Other Related Offences Commission](#) has taken on some specific MACN activities through its training and research institute, the [Anti-Corruption Academy of Nigeria](#)
- An online HelpDesk – called the User Experience Diary – was developed and launched to enable port users to report challenges during cargo clearance
- As of September 2023, the HelpDesk received 946 Pre-Arrival Notifications (PANs) from port users, out of which 135 incidents required escalation due to reported bribery attempts. Of these escalated incidents 97,78% were successful resolved without bribery payments being made
- Some 201 government officials and 40 stakeholders were trained on leadership and compliance

- An e-learning programme comprising of 3 modules – [Welcome](#), [Module 1](#) and [Module 2](#), for importers and exporters was developed and launched in collaboration with the Integrity Alliance and Project Steering Committee

#### Impact

- Through the application and enforcement of standard operating procedures, there is now more clarity of roles and responsibilities in Nigeria's ports
- The introduction of the Port Standing Task Team has strengthened the ability of ports to detect and respond to non-compliance
- A new culture of demanding compliance reports supported by data and evidence is now taking root
- There is legal backing through the [Business Facilitation Act \(BFA\) of 2022](#)
- MACN's methodology has been mainstreamed into the anti-corruption mandate of key institutions

## DESCRIPTION OF INTEGRITY PARTNER

The **Organisation for Economic Co-operation and Development** (OECD) is an international organisation that works to build better policies for better lives.

Our goal is to shape policies that foster prosperity, equality, opportunity and well-being for all.

We draw on almost 60 years of experience and insights to better prepare the world of tomorrow.

Together with governments, policy makers and citizens, we work on establishing international norms and finding evidence-based solutions to a range of social, economic and environmental challenges.

Name of Integrity Partner:

## Organisation for Economic Co-operation and Development

## PROJECT:

### Fair Market Conditions for Competitiveness in the Adriatic Region

COUNTRY OF IMPLEMENTATION:

Bosnia and Herzegovina,  
Croatia and Serbia

DURATION:

3 years

USD (MILLION):

1,70 M

REGISTERED IN:

France

The project intends to support the creation of a level-playing field and fair market conditions in three pilot countries from the Adriatic Region (Bosnia and Herzegovina, Croatia and Serbia) in order to enhance competitiveness and integrity in a sustainable and inclusive way. It aims to gather government officials, business representatives, civil society and academia to form a "Collective Action" to address country-specific drawbacks by applying international standards, by:

- Raising awareness about OECD standards and good practices of anti-corruption, integrity and fair competition for competitiveness with governments, business and civil society

- Building capacity and fostering the implementation of concrete OECD recommendations with regard to the transparency and efficiency of anti-corruption and competition authorities
- Promoting the latest knowledge on international standards and practices in the area of anti-corruption and integrity for competitiveness in academic curricula



#### PROJECT AT A GLANCE:

Help create fair market conditions in the Adriatic Region by promoting OECD standards via a Collective Action community, by supporting the design and implementation of actionable policy recommendations

#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – DECEMBER 2022):

The project increased regional stakeholder awareness of integrity challenges and OECD standards and good practices for a level playing field, while enhancing the capacity of stakeholders to implement key reforms and promoting integrity through improved university curricula.

- Awareness was increased through:
  - 8 Collective Action roundtables with ~250 participants to discuss work progress and good practices
  - 28 meetings with government officials and Collective Action Community members to discuss and adapt draft recommendations
  - 3 final roundtables to endorse project results and recommendations
  - 15 newsletters shared bi-monthly with over

300 Collective Action members to disseminate knowledge and maintain momentum

- creating and updating the [project webpage](#) (~2 000 visits) and releasing ~40 tweets to build awareness and promote findings

- Capacity was enhanced through:
  - [3 Country Profiles](#) to assess challenges to a level playing field and provide recommendations
  - [12 Policy Briefs](#) to guide reforms on e.g. on [Whistleblower Protection to Fight Corruption](#), the [OECD Recommendations on Open Government](#), [OECD Recommendations on Competitive Neutrality](#), the [OECD Competition Assessment Toolkit](#) and others
  - [3 manuals for policy makers](#) to help them access project information to guide reform making
  - engaging with ~200 stakeholders to build capacity in ~40 OECD events
- International standards in academia were promoted through:
  - 3 background notes to assess academic curricula
  - 2 online training sessions with the academia expert group to increase expertise on key competition challenges, the [OECD Anti-Bribery Convention](#) and Anti-Corruption Legal Clinics
  - 5 meetings with the academia expert group to enhance curricula

- 3 lectures with ~130 students on OECD standards and regional challenges to increase awareness and build integrity

#### Impact

- Collective Action Community members have gained awareness and have further elaborated and endorsed tailored policy responses in support of fair competition while building on a broad set of OECD good practices, with key reforms underway e.g. in Serbia, the Commission for Protection of Competition developed a checklist based on the OECD Competition Assessment Toolkit, Croatia updated its Whistleblower Act and in Bosnia and Herzegovina, the initiative to introduce the Business Ombudsman institution in line with Project recommendations has made progress
- Partner universities substantially reworked curricula to improve learning outcomes and awareness about corruption to anchor a culture of integrity e.g. at the University of Zagreb, the “Public Sector Management” course was updated with OECD materials, as was “Institutional Development and Concurrency” the University of Rijeka. The Project also supported introducing anti-corruption legal clinics at the University of Split and Banja Luka

## DESCRIPTION OF INTEGRITY PARTNER

**The Ethics Institute** is an independent institute producing original thought leadership and offering a range of services and products related to organizational ethics.

**Vision:**  
Building an ethically responsible society

**Mission:**  
Enabling and supporting the cultivation of ethical organisations

**What we do:**  
We pursue our vision and mission through thought leadership and an organizational ethics-related offering, including training offerings, advisory services, assessments, audit services, products and videos

Name of Integrity Partner:

## The Ethics Institute (TEI)

## PROJECT:

### Collective Action to advance business integrity in Mozambique

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Mozambique	5 years	0,80 M	South Africa

This project focuses on interventions using a Collective Action approach. The purpose is to strengthen business integrity capacity, contributing to reducing corruption in business activities, resulting in enhanced business practices in Mozambique.

The first objective is to initiate and maintain the formation of a Coalition for Organisational Integrity (COI) in Mozambique.

The second objective aims to strengthen ethics management capacity of the participants of the COI by training its representatives on institutionalising business integrity.

The third objective is focused on the development and implementation of an ethics and anti-corruption training program for small-and-medium enterprises (SMEs).

In sum, this project aims to establish an effective Collective Action platform to affect significant change in business conduct, as thought-leaders engage in the sharing of best practices. This could result in improved procurement, stakeholder management and relations between business and the public sector.

#### PROJECT AT A GLANCE:

To enhance the ease of doing business by forming a coalition for organizational integrity and expanding business ethics management capacity in Mozambique

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- In partnership with [Mozambique Enterprise Development Center](#) (MozUp), 182 suppliers expressed interest in the [Ethically Aware Supplier Induction](#) (EASI) programmes. An impact study has confirmed a positive shift in perceptions and awareness of supplier-related ethics
- 2 additional handbooks – the [Ethical Leadership Handbook](#) and the [Ethics Ambassador Handbook](#) – expanded the range of Portuguese knowledge resources
- The media event hosted to [launch the Ethical Leadership Handbook](#) attracted 72 representatives from business, media, and academia

- Ethics management capacity was strengthened by certifying 7 additional ethics officers and 2 ethics ambassadors. Following letters of reference from The Ethics Institute, 2 ethics specialists were successfully enrolled at the International Anti-Corruption Academy in Vienna and subsequently attained international anti-corruption masters qualifications
- 19 Mozambican delegates joined the Ethics Officer Certification Programme in Portuguese, contributing to building regional ethical leadership capacity
- The Ethics Institute actively supported business ethics-related seminars and conferences, including [OECD](#) and [Basel Institute on Corporate Governance](#) events, and the Business Ethics Network of Africa [conference](#)

#### Impact

- The [Coalition for Organisational Integrity](#) (COI) experiences sustained demand for participation in public events, thus contributing to responsible leadership in Mozambique

- Ongoing requests for Portuguese-speaking Ethics Specialists who can participate in public dialogues on topical integrity matters indicate the growing public awareness about the importance of ethics in public life
- There is some evidence that knowledge of integrity standards and best practice among Mozambican SMEs has been enhanced and the impact study confirms that:
  - learning material is practical and has transformed thinking about supplier-related ethics
  - the [Ethically Aware Supplier Induction](#) (EASI) training has ignited SME ethics awareness and is confirmed as valuable and effective in improving the understanding of business ethics, SME's rights, and the regulatory environment

## DESCRIPTION OF INTEGRITY PARTNER

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Name of Integrity Partner:

## The Ethics Institute (TEI)

## PROJECT:

### Combating municipal and procurement corruption in South Africa

COUNTRY OF IMPLEMENTATION:

DURATION:

USD (MILLION):

REGISTERED IN:

South Africa

5 years

1,00 M

South Africa

Based on TEI's experience with local government, it was established that ethical challenges at municipal level will not be solved without an intervention on the ethics of political leadership. TEI and relevant national government structures conceptualised an intervention for developing a national code of ethical governance in municipalities. The code should be the outcome of a structured national dialogue and consultation, should have broad societal legitimacy, and should give practical guidance on the ethical intricacies faced by political and administrative leaders in municipalities.

The second objective is the implementation of an Ethically Aware Supplier Induction (EASI) training and accreditation programme that will allow small-and-medium enterprises (SMEs) to

be accredited as 'Ethically Aware Suppliers'. The aim is to create a network of large organisations that are committed to utilising ethically aware suppliers, and a network of trainers who will continue to train suppliers in their organisations resulting in a culture of ethical business and co-accountability escalating across all procurement relationships.

The third objective aims to build capacity in the Gauteng Provincial Government to support municipalities' ethics initiatives. The development of an ethics management monitoring and reporting tool will assist ethics officers structure interventions and improve reporting to oversight structures. This will ensure external oversight of ethics remains a drive of improved governance.

#### PROJECT AT A GLANCE:

### Using strategic levers of ethical change to combat municipal and procurement corruption in South Africa

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- Activities relating to the [Local Government Ethical Leadership Initiative \(LGELI\)](#) saw
  - the [exposure draft](#) of the Code for Ethical Leadership in Local Government released, finalised and distributed to all municipalities
  - at least 220 civil society participants and 1 200 municipal participants engaged at 10 events
  - LGELI incorporated in the curriculum for Councillor induction run nationally by the [South African Local Government Association](#)
  - the Minister for Cooperative Governance committed to host a [summit](#) to launch the finalised Code
- To further promote the [Ethically Aware Supplier Induction \(EASI\)](#) programme
  - 28 organisations were engaged to bring their suppliers on board
  - 71 participants were enrolled on the programme and 37 companies were accredited as ‘Ethically Aware’
  - 2 in-person training sessions were held with 30 participants, and 1 Train-the-Trainer programme was facilitated to train 7 trainers
  - 68 supply chain management officials from 11 municipalities enrolled on the EASI programme
- Although the [Gauteng Municipal Integrity Project \(GMIP\)](#) was mostly completed in the previous year
  - the Gauteng Provincial Government is continuing its engagement with municipalities, predominantly through the Gauteng Municipal Ethics Officer Forum
  - transparency around municipal investigations is being improved through the Local Government Anti-Corruption Forum and the Gauteng Municipal Ethics Officer Forum
  - the Ethics Monitoring and Reporting Tool is assisting with standardisation in reporting

#### Impact

- Having the LGELI incorporated into the presentations and training programmes of government role players is influencing the Ethical Leadership discourse independently of the project work
- The EASI programme has raised awareness of ethical business practices among hundreds of SMEs and government SCM officials
- The Gauteng Provincial Government is independently convening an Ethics Officer Forum and promoting standardised anti-corruption reporting

## DESCRIPTION OF INTEGRITY PARTNER

**POLMED** is the biggest and the most recognized organization representing manufactures and distributors of medical devices in Poland. It represents the common interests of its members, offers support in all matters regarding the functioning of the Polish medical devices market, legal solutions etc.

POLMED acts as a source of information for its members, protects their interests and conveys their views to the decision makers in the industry and the government. POLMED has been involved in the promotion of ethical business conduct among medical devices market participants since 2010. It strongly emphasizes the importance of the medical devices industry's Code of ethics, which is to be respected by all member companies. POLMED is a member of MedTech Europe.

Name of Integrity Partner:

## The Polish Chamber of Commerce of Medical Devices (POLMED)

PROJECT:

MedKompas III			
COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Poland	4 years	0,89 M <sup>1</sup>	Poland

The project with its objectives and activities is the result of POLMED's experience in the market and its observation of the healthcare system and participants needs.

The MedKompas III project is highly innovative in respect of its size and impact on the healthcare system. It foresees numerous trainings on anti-corruption law and ethical standards of cooperation with 1 420 participants, several public debates, many anti-corruption system implementations where each implementation will have an impact on around 700 individuals employed in a given hospital.

The MedKompas III project focuses on two main objectives which are:

Objective 1: Creating fair market conditions by reducing the susceptibility to corruption among the Polish healthcare system participants

Objective 2: Prevention of illusory implementation of anti-corruption procedures in hospitals which will contribute and lead to creation standards for fair market conditions

Both objectives are crucial in fighting corruption and raising the importance of compliance in healthcare systems.

#### PROJECT AT A GLANCE:

To create fair market conditions and reduced susceptibility to corruption among the Polish healthcare system participants by providing education on new planned anti-corruption legislation as well as by implementing professional anti-corruption solutions and systems in hospitals

#### KEY ACTIVITIES

(OCTOBER 2022 – SEPTEMBER 2023):

- At the [Autumn Program Conference of the Polish Hospital Federation](#) convened on December 1, 2022, [MedKompas](#) organized a [public debate](#) which focused on the upcoming legal protection of whistleblowers system and the consequences for hospitals. The director of the hospital in Zakopane where the first anti-corruption system was implemented by the project was included as a speaker and 284 participants were in attendance
- A [conference](#) convened on June 5, 2023 under the theme "Hospitals and their suppliers: How to cooperate properly" with 200 participants, and with speakers from the Public Procurement

Office, the Polish Hospitals Federation, various hospitals, as well as legal, MedKompas and POLMED experts, summarized the activities of the project and addressed topics such as law and ethics in public procurement from the perspective of both hospitals and suppliers, the discipline of commercial communication versus corruption risks, and legal responsibility in public procurement in the healthcare sector

- 19 training sessions on anti-corruption and ethics – thereof 5 in-person – were held for hospital employees across the country
- 570 healthcare employees including hospital directors, hospital management, doctors and nursing staff participated in the 19 training sessions. In the feedback provided by the trained employees, 63 % indicated a higher awareness of corruption risks and a personal change in behavior that would make them less susceptible to corruption
- 22 hospitals are in scope for anti-corruption system implementation, currently exceeding the project plan by 1. The implementation status is as follows:
  - 5 completed as previously reported in Opole, Otwock, Warszawski Szpital dla Dzieci, Wołomin and Zamość

- 9 completed in this reporting period in Białystok, Bydgoszcz, Gliwice, Kraków, Olsztyn, Poznań, Warszawa, Wrocław – Dolnośląski Specialistic hospital and Złotów, with 12 026 employees and healthcare professionals now governed by internal anti-corruption procedures
- 8 in progress in Brzeziny, Goleniów, Krasnystaw, Kutno, Łódź – Salve Medica, Pisz, Pszczyna and Puławy

#### Impact

- The project has raised awareness on the importance of compliance and ethical business practice has inspired another healthcare sector group to also pay attention to corruption issues and to approach MedKompas for expert guidance. This demonstrates the spill-over effect from one healthcare group to another
- The broad spectrum of project activities covering both training and anti-corruption system implementation in hospitals has created a strong foundation to protect the healthcare sector from corruption

## DESCRIPTION OF INTEGRITY PARTNER

**Transparency International (TI)** – Bulgaria, being part of Transparency International – the global coalition against corruption, is a non-profit organization working on promotion of integrity and fighting corruption in Bulgaria for more than 25 years.

TI's mission is to unite the efforts of government institutions, local authorities, private sector and media in order to carry out systematic reforms and take concrete action against the spread of corruption in the country.

TI's vision is a world where governments, politics, business, civil society and the daily lives of people are free of corruption.

TI's values are transparency, accountability, integrity, solidarity, determination, justice and democracy.

Name of Integrity Partner:

## Transparency International (TI) Bulgaria

## PROJECT:

### Setting the Ground for Business Integrity in Bulgaria

COUNTRY OF IMPLEMENTATION:

Bulgaria

DURATION:

4 years

USD (MILLION):

0,75 M

REGISTERED IN:

Bulgaria

The project "Setting the Ground for Business Integrity in Bulgaria" ultimately aims at encouraging the adoption of voluntary anti-corruption and compliance standards and fostering a culture of integrity in business in Bulgaria.

The initiative will target the development and promotion of high-quality sectoral integrity standards in the key sectors of Energy, Industry and Healthcare, ensure pioneers to adopt and distribute them through their supply chains, and establish a better understanding of the need for business integrity in Bulgaria.

The proposed set of activities includes a participatory approach that includes all relevant stakeholders. TI will develop the sectoral integrity standards and ensure their endorsement by key business associations.

The project will map the targeted sectors and secure buy-in from at least three businesses that possess the potential to become pioneers of successful change.

TI will work with them to make sure the standards are adapted to their needs and will engage actively in the development of a model for the further promotion of the same principles and procedures through the pioneers' supply chain.

Finally, the project will advocate the importance of the topic towards relevant institutions and provoke a more targeted dialogue with them.



#### PROJECT AT A GLANCE:

Encourage the adoption of voluntary anticorruption and compliance standards and foster a culture of integrity in business in Bulgaria, ultimately ensuring fair competition

#### KEY ACTIVITIES

(OCTOBER 2022 – SEPTEMBER 2023):

Project advocacy, implementation of business integrity standards and training efforts focused on key companies in the Industry and Healthcare sectors, various business associations and relevant government ministries and education institutions. These include:

- Working on the implementation of a Memorandum with the [Bulgarian Development Bank](#) to assess and develop their good governance and business integrity systems, which in turn creates a meaningful path to good governance for the bank's clients
- Implementing integrity standards in the [Haskovo Chamber of Commerce](#) which enables the further dissemination of business integrity standards to its members
- A new cohort of young leaders and professionals benefitting from the Business Integrity Course developed and delivered by TI Bulgaria for the [Responsible and Sustainable Business Management Master's Program](#) at Sofia University – 45 students in total
- More than 12 Business Integrity Club and other meetings with representatives of Industry, Energy and Healthcare sector companies to promote and implement business integrity standards
- Advocacy meetings with the Deputy Prime Minister for the Management of European Funds, Ministry of Economy, the office of the Prime Minister from the new government as well as the Ministry of Justice
- Organizing a [high-level forum on Collective Action](#) in collaboration with the Basel Institute on Governance to place business integrity at the forefront of Government and business agendas and to create fora for dialogue and implementable actions
- Developing an online block chain system for enabling the integrity of different types of documents in public and private sector organizations
- Adopting procedures to implement business integrity standards in the Healthcare sector for [1 hospital](#) and [1 medical center](#)
- Active work on the implementation of business integrity standards for [1 hospital](#) and [1 energy sector](#) company
- Fully implementing business integrity standards in [1 industry sector company](#)
- 14 online media publications, 11 published paper articles in regional and national newspapers and radio interviews on business integrity and whistleblowing

#### Impact

- TI Bulgaria's recommendations influenced the elaboration of the Whistleblowing Protection Act which became effective in 2023 and which requires Bulgarian companies to have internal whistleblowing mechanisms
- TI Bulgaria took part in the preparation of the concept for the Lobbying Activity Act
- The engagement with prominent business associations, companies, ministries, and academic institutions has enhanced the awareness and standards of business integrity, and has raised the visibility and importance of business integrity in the public discourse

## DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

- serving as the guardian of international treaties and the secretariat to global policymaking bodies;
- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

## UN Office on Drugs and Crime (UNODC)

## PROJECT:

**On the Level: Business and Government against Corruption in Colombia (Phase II)**

COUNTRY OF IMPLEMENTATION:

**Colombia**

DURATION:

**4 years**

USD (MILLION):

**1,10 M**

REGISTERED IN:

**Austria**

Since 2015, UNODC has led “On the Level”, a Collective Action project in Colombia that brought together the public and private sectors to enhance corruption prevention and enforcement, supported by the UN Global Compact Network Colombia and the Secretary of Transparency of the Presidency.

Building on that, the new project will promote a culture of integrity and a better understanding of corruption in particular sectors and in public procurement.

It will focus on two industries vulnerable to corruption: energy and healthcare.

In particular, the project will review existing legislation and public policy to identify corruption risks and typologies and provide recommendations on improving public procurement

in Colombia. Beneficial ownership will be addressed in this context.

The project will also promote the signing and implementation of Collective Action Pacts involving representatives from the public sector, energy and health-care industries, guilds, small and medium sized enterprises (SMEs), as well as civil society organizations (CSOs).

The Pacts will underline the importance of transparency in public procurement and raise awareness on corruption’s impact on the Sustainable Development Goals.

The project will have a strong online communication strategy to promote knowledge sharing and the dissemination of relevant tools on anti-corruption.

#### PROJECT AT A GLANCE:

To promote a culture of lawfulness in public procurement in the energy and healthcare sectors in Colombia as a mechanism to prevent and fight corruption

#### KEY ACTIVITIES

(OCTOBER 2022 – SEPTEMBER 2023):

- A document on beneficial ownership transparency was finalized and disseminated. The document draws from the results of technical workshops carried out with stakeholders from Argentina, Chile, Colombia, México and Peru, and it includes recommendations on how to strengthen beneficial ownership transparency in beneficiary countries
- A draft Collective Action pact for the healthcare sector was developed and shared with stakeholders. It is based on a [sectoral corruption risk assessment](#). A draft roadmap for the implementation of the Collective Action pact was also prepared
- The roadmap for the Collective Action pact in the energy sector was approved by stakeholders and will now be implemented. It is also based on a [sectoral corruption risk assessment](#)
- Five anti-corruption training sessions for stakeholders of the energy and healthcare sectors were held. The training focused on the identification and evaluation of corruption risks, the definition of risk mitigation strategies, and included practical exercises
- A training session on reporting channels and whistle-blower protection was held for stakeholders from the energy sector to strengthen their anti-corruption knowledge
- Four sessions of the Network of Compliance Officers were facilitated with approximately 80 participants per session. The compliance officers received training on anti-corruption, and they were encouraged to share good practices from their companies to learn from each other

#### Impact

- [Enhanced business integrity](#) by strengthening beneficial ownership transparency and mitigating corruption risks in public procurement in Colombia and the region
- More robust anti-corruption capacities of relevant stakeholders in the energy and healthcare sectors enable Collective Action and contribute to a cleaner business environment
- Widespread knowledge of [up-to-date tools](#) and approaches to prevent and counter corruption contributes to fairer market conditions

## DESCRIPTION OF INTEGRITY PARTNER

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- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

## United Nations Office on Drugs and Crime (UNODC)

PROJECT:

### UNODC Global Integrity Education

COUNTRY OF IMPLEMENTATION: DURATION:

Global (with focus on Kenya, Mexico, Pakistan)

3 years

USD (MILLION):

1,00 M

REGISTERED IN:

Austria

The project will establish and implement an effective integrity education programme that fosters ethical decision-making in the private sector and empowers employees to serve as “ethics ambassadors” in companies.

The project’s most innovative aspects are: integrity education modules co-created by academics and business practitioners; student-focused teaching methods; and graduates who join the private sector as key ethics players.

The project will increase ethical commitment in the private sector by involving business managers in localizing education materials for universities and implementing on-the-job ethics courses that fit the work environments

of industries vulnerable to corruption (e.g. law firm, banks). It utilizes bottom-up and top-down approaches for the highest impact. Significantly, the project will establish a link between university education and practical training, ensuring that ethics education is an ongoing process continuing from the formation to the career stage. Impact studies aimed at monitoring, evaluating and learning (MEL) will be carried out periodically to ensure goal attainment.

The project will be implemented in Kenya, Mexico, and Pakistan and will inform a global audience of educators and practitioners connected through UNODC’s worldwide networks.

#### PROJECT AT A GLANCE:

To equip young graduates with ethical mindsets and strategies at the start of their careers in the private sector and empower them to become a driving force for ethical business

#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – SEPTEMBER 2023):

- 3 localized, self-paced e-learning courses for lecturers were created and [16 localized UNODC university integrity modules](#) were developed as teaching resources
- 395 lecturers were trained on teaching the UNODC modules in Kenya (93), Mexico (207) and Pakistan (95)
- 38 370 university students were educated by the lecturers who were trained on teaching the UNODC modules in Kenya (7 136 students), Mexico (8 713 students) and Pakistan (22 521 students)
- 125 guest lectures by private sector representatives were held – 2 in Kenya, 31 in Mexico and 79 in Pakistan – to make the teaching of UNODC modules more practice-oriented
- 49 students who were taught the UNODC modules have joined companies as “Ethics Ambassadors” – 25 in Kenya, 3 in Mexico and 21 in Pakistan – to build their skills and link university education to practice
- 9 Ethics Ambassadors’ meetings were held to exchange experiences and new ideas to promote business integrity
- 25 on-the-job integrity sessions were delivered on the topics “Leading with Integrity” and “Corruption Risk Assessment and Compliance” and reached 682 private sector representatives
- UNODC carried out a pilot impact assessment in Mexico and Pakistan to measure the change of ethical mindsets of students through the teaching of UNODC modules
- 16 local and 4 global Support Group meetings as well as an International Good Practice Forum were held to facilitate a knowledge exchange between stakeholders from Kenya, Mexico and Pakistan

#### Impact

- Ethical mindsets and decision-making of 38 370 university students who were taught UNODC university modules are strengthened as evaluated by the pilot impact assessment, and now they have the skills and knowledge to apply their learning to their future workplaces
- Significant collaboration between academia and the private sector has been created in Kenya, Mexico and Pakistan, resulting in new teaching materials on anti-corruption as well as increased cooperation between academia and the private sector

## DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

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- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

## United Nations Office on Drugs and Crime (UNODC)

## PROJECT:

### Strengthening the Integrity and Anti-Corruption Efforts of the Private Sector in Myanmar

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

Myanmar

3 years

0,80 M

Austria

The objective of this project is to reduce opportunities for corruption and create a culture of integrity in the private sector.

Corporate integrity is rarely at the top of the agenda in the private sector and most private companies in Myanmar have not yet adopted codes of conduct or guidelines on corporate integrity. The lack of anti-corruption standards is slowing down development in most of the important economic sectors. For example, the licensing system in the extractive industries is open to corruption and risk of conflict of interest.

Bribery, particularly involving public officials, is reported as common in daily business and civilian interactions. Discussions about business integrity have started recently but are only at early stages and are only concentrated in specific sectors.

To address the defined gaps, this project will promote the development and adoption of codes and guidelines in the private sector, as well as the development of a culture of integrity in businesses in Myanmar.

#### PROJECT AT A GLANCE:

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To reduce opportunities for corruption and create a culture of integrity in the private sector

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#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – SEPTEMBER 2023):

- Developed key tools to improve business integrity practices and reduce risk, including a [project website](#), a [serious game on business integrity](#), a model business code of conduct, a standard operating procedure for code of conduct for companies, a draft model whistle-blowing/speak-up policy and model internal reporting mechanism, and an [online corruption risk assessment tool](#)
- Disseminated key tools through the project website [Business Integrity Myanmar](#)
- Conducted a business integrity training for 15 companies using the UNODC developed serious game
- Developed a legal analysis with recommendations for the anti-corruption legislative framework related to beneficial ownership transparency
- Undertook a series of Business Integrity Advisory Panel meetings contributing to continuous stakeholder engagement and encouraged discussions and feedback
- Contextualized 2 “Leading with Integrity” training sessions with input from the Business Integrity Advisory Panel, and organized 2 trainings for 48 business representatives
- Conducted consultative meetings and interviews on business integrity with 20 companies and a validation workshop with 27 business leaders
- 2 panellists from Myanmar participated in the Global Webinar Series on Business Integrity, sharing insights of SMEs and their business integrity experiences
- Conducted 3 business integrity webinars on sharing best practices, attracting 211 participants from Myanmar’s private sector
- Representative from Myanmar’s private sector attended the Asia-Pacific Anti-Corruption Collective Action forum in Manila, Philippines and UNODC’s experience in Collective Action in Myanmar was shared at a panel session

#### Impact

- Companies are empowered with the knowledge, tools and resources to strengthen their capacity to prevent and counter corruption, striving to drive positive change and contribute to a more transparent and responsible business environment
- Increased dialogue among private sector stakeholders contributed to establishing Collective Action and fostering a culture of integrity

## DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

- serving as the guardian of international treaties and the secretariat to global policymaking bodies;
- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

## United Nations Office on Drugs and Crime (UNODC)

## PROJECT:

### Strengthening the private sector capacity to prevent corruption and enhance integrity in the Arab Countries

COUNTRY OF IMPLEMENTATION: DURATION:

Egypt, Iraq, Libya, Morocco, Sudan and United Arab Emirates

4 years

USD (MILLION):

2,40 M

REGISTERED IN:

Austria

Reducing corruption by strengthening anti-corruption frameworks, public-private sector dialogue, and private sector capacity to enhance integrity.

The UNODC project on “Strengthening the private sector capacity to prevent corruption and enhance integrity in the Arab Countries” aims to reduce opportunities for corruption by strengthening public sector anti-corruption frameworks, private sector capacity to enhance integrity, and by stimulating public-private sector dialogue.

Project implementation will be guided by the [United Nations Convention against Corruption \(UNCAC\)](#) which represents the only legally binding universal anti-corruption instrument and covers many different forms of corruption.

The project will assist six Arab countries (Egypt, Iraq, Libya, Morocco, Sudan and United Arab Emirates) to introduce legislative improvements to combatting corruption in the private sector; improve communication between the public and private sectors by providing a common venue for further interaction, dialogue and knowledge sharing; and provide guidance to companies and Small and Medium Enterprises (SMEs) to develop their anti-corruption code of ethics and compliance programmes.



#### PROJECT AT A GLANCE:

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To reduce corruption by strengthening countries' anti-corruption frameworks, public-private sector dialogue, and private sector capacity to enhance integrity

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#### KEY ACTIVITIES

(OCTOBER 2022 – SEPTEMBER 2023):

- A [web-based tool](#) was finalized to enable small and medium-sized companies (SMEs) in the [project countries](#) assess corruption risks and adopt mitigation measures. The tool was finalized after a series of consultation with private sector experts. The tool helps SMEs make first steps in developing internal compliance programmes in light of the customized results produced by the tool for each company
- Several companies started to develop their internal compliance programmes with the project's support

- In total, 283 participants representing different government entities and SMEs have participated in capacity building activities on preventing corruption and enhancing integrity measures or in public/private dialogue events
- The project's mid-term evaluation was drafted, with the purpose of assessing the level of contribution of the project and extent to which the project reached its objectives. The mid-term evaluation was prepared after consulting all the project documents, reports, and publications, as well as interviewing the project staff, counterparts, and beneficiary SMEs from each country
- Increased the knowledge of SMEs about integrity standards and channels to report corruption
- Increased the knowledge of SMEs about the importance of assessing corruption risks and the adoption of corresponding mitigation measures and controls and increased their ability to independently assess and mitigate their corruption risks

#### Impact

- Supported the strengthening of partnerships and the improvement of dialogue between the public and private sectors for the purposes of combating corruption
- Encouraged and supported governments in the region to improve the legal anti-corruption framework for business integrity by providing legal and policy recommendations

## DESCRIPTION OF INTEGRITY PARTNER

**WU** (Vienna University of Economics and Business) is Europe's largest Business and Economics University offering degree programs as well as a wide range of specialization areas and research opportunities. Project responsibility will be undertaken by the Institute for Austrian and International Tax Law.

The Institute for Austrian and International Tax Law is one of the world's largest academic institutions engaged in the research and teaching of the tax law. The Institute has a longstanding tradition in organising international conferences and trainings both for practitioners and tax administrations.

Name of Integrity Partner:

## Wirtschaftsuniversität Wien (Vienna University of Economics and Business)

## PROJECT:

### Tax Transparency and Corruption

COUNTRY OF IMPLEMENTATION:

DURATION:

USD (MILLION):

REGISTERED IN:

Ghana, Kenya, Nigeria,  
Rwanda, South Africa,  
Uganda, Zambia

4 years

0,80 M

Austria

The project aims to change the dynamics of the interaction between business and tax administrations and to deepen the cooperation between tax authorities and other law enforcement agencies in countering tax evasion and other financial crimes.

The project would promote the concepts of good tax governance and the importance of a transparent tax system for economic development and how law enforcement agencies and tax authorities can cooperate to counter the misuse of beneficial ownership and client-attorney privileges to counter evasion and money laundering.

The project will be developed with the view of attaining the following objectives:

1. Identifying and mobilizing stakeholders in national tax administrations and private sectors and setting out a research agenda
2. Drafting model national tax legislation and international tax agreements with an aim of strengthening country specific anti-avoidance rules, improving the effectiveness of the tax administrations to get access to information and fostering better cooperation between tax authorities and Multi-National Enterprises (MNE's)
3. Creating a network of "ambassadors" of key institutions in Africa who will be able to disseminate and promote the outcomes from the project

#### PROJECT AT A GLANCE:

The project aims to change the dynamics of the interaction between business and tax administrations and to deepen the cooperation between tax authorities and other law enforcement agencies in countering tax evasion and other financial crimes

#### KEY ACTIVITIES OVER THE ENTIRE PROJECT PERIOD (OCTOBER 2019 – SEPTEMBER 2023):

- The inaugural conference in 2019 brought together over 200 officials from financial intelligence units, tax and customs, ministries of finance, justice, academics and private sector representatives from 25 African countries. The forum agreed to focus on subject matter areas relating to Beneficial Ownership, Client-Attorney Privilege, Cooperative Compliance, Interagency Cooperation and Unexplained Wealth Orders
- [The wrap-up conference](#) was convened in Vienna, Austria on July 4 to 6, 2023 with over 90 participants from over 20 African countries representing tax and customs authorities, financial intelligence units, civil society, private business and international organizations, and the subject matter areas were extended

to cover high net-worth individuals and the challenge they pose for tax administrations and financial intelligence units

- At this conference the [African Parliamentarians Network Against Corruption](#) presented to Wirtschaftsuniversität Wien the "[Champion Against Corruption Annual Award](#)" in recognition of the project work since 2015
- The completion of a [Cooperative Compliance Handbook](#) in 2021 which was presented to the [Belt and Road Initiative \(BRI\)](#) virtual workshop in December 2021
- The joint publication with the World Bank in 2022 on Interagency Cooperation titled "[Taxing Crime: A Whole-of-Government Approach to Fighting Corruption, Money Laundering, and Tax Crimes](#)"
- The publication in 2023 on Unexplained Wealth Orders titled "[Unexplained Wealth Orders: Toward a New Frontier in Asset Recovery](#)"
- The continued strengthening of strategic partnerships with key organizations including the [United Nations Office on Drugs and Crime \(UNODC\)](#), the [World Bank](#), the [Stolen Asset Recovery Initiative \(StAR\)](#), the [African Tax Administration Forum \(ATAF\)](#), the African Union, the [United Nations Conference on Trade](#)

[and Development \(UNCTAD\)](#), the [United Nations Office of the Special Adviser on Africa \(UN OSAA\)](#), the [German Agency for International Cooperation \(GIZ\)](#), the [Extractive Industries Transparency Initiative \(EITI\)](#), [Open Ownership](#), the [African Development Bank](#) and the [Tax Justice Network Africa \(TJNA\)](#)

#### Impact

- The project has increased the engagement of the public administration, business and civil society in the project work, and the Champion Against Corruption Annual Award is indicative of the strategic impact the project has had on policymakers within the region
- The project established an informal network of south-south dialogue officials to exchange experiences in combatting illicit financial flows through the focus groups, specifically in all the subject matter areas mentioned before
- The outputs have been fed into the mentioned key organisations, which in turn has led to legislative changes in the participating countries e.g. on [Beneficial Ownership and Interagency Cooperation](#)

# C4.

## Golden Stretch Funding Round Projects: Project Profiles and highlights of activities in 2023

All 8 projects under the Golden Stretch Funding Round build upon previous funding rounds and the descriptions of activities undertaken in 2023 for all 8 projects were provided by the Integrity Partners in their respective Annual Progress Report 2023 and are approved by the relevant Integrity Partners for external use.

All 8 projects are active and implementation of activities is in progress.



## DESCRIPTION OF INTEGRITY PARTNER

Established in 2003, the **Basel Institute on Governance** is an independent and international non-profit organisation working around the world with public and private partners to prevent and combat corruption and strengthen governance.

- The Private Sector team takes a dual approach to engaging and strengthening the private-sector response to corruption risks in business transactions by advancing anti-corruption Collective Action and through advice and technical assistance to private corporations and state-owned enterprises. It hosts the **B20 Collective Action Hub**
- The International Centre for Asset Recovery (ICAR) at the Institute works with countries around the world to strengthen their capacities to recover illicit assets
- The Green Corruption programme is a multi-disciplinary initiative that targets environmental degradation using anti-corruption and governance tools
- The Prevention, Research and Innovation (formerly Public Governance) team connects corruption research with anti-corruption practice

Name of Integrity Partner:

## Basel Institute on Governance

PROJECT:

### Towards new horizons for Collective Action

COUNTRY OF IMPLEMENTATION: DURATION:

USD (MILLION):

REGISTERED IN:

Global

3 years

3,50 M

Switzerland

This project aims to sustain and expand the use of Collective Action to prevent corruption and promote responsible business.

It will leverage the Basel Institute's experience in mentoring and supporting current and upcoming Collective Action leaders; showcase its wide applicability; and market Collective Action through the B20 Collective Action Hub and key partners.

The project will multiply strategic efforts to embed Collective Action as a norm and bring it into new sectors, including through initiatives that combine anti-corruption and related

sustainable development goals. The supporting marketing strategy includes a global index, conferences and annual awards. The B20 Collective Action Hub will aim to achieve long-term sustainability as the global go-to centre on Collective Action. Online courses and a virtual help desk will provide a space for all interested parties to gain and share advice, skills and knowledge on Collective Action.

The project will culminate in a comprehensive volume of learnings from Siemens Integrity Initiative-funded projects to promote clean business and level the playing field.

#### PROJECT AT A GLANCE:

To leverage the Institute's leadership and experience in Collective Action by mentoring and supporting other current and potential Collective Action leaders, by showcasing its applicability in a wide range of corruption related risk areas and by marketing the concept of Collective Action so that it will be sustainably anchored through the B20 hub and key integrity partners

#### KEY ACTIVITIES

##### (OCTOBER 2022 – SEPTEMBER 2023):

- The project convened 2 regional Collective Action forums attracting over 120 participants in total from the private sector, public sector, civil society and academia. The first was the [Southern African Forum](#) in Johannesburg on May 31, 2023, and the second was the [Asia-Pacific Forum](#) in Manila on September 25, 2023
- 2 regional awards to celebrate achievements in Collective Action coincided with the regional forums. Out of 15 applications in

total – 6 for the [Southern African award](#) and 9 for the [Asia-Pacific award](#) – the winners selected by a jury with local experts are [The Infrastructure Transparency Initiative \(CoST\) Uganda](#) and the [Thai Private Sector Collective Action Against Corruption](#)

- 5 new organisations were selected to join the second cohort of the [project mentorship programme](#). Mentoring of the first cohort is still ongoing and has led to the formation of a Collective Action 'Community of Practice'
- 3 modules of a new interactive e-learning Collective Action course are currently being tested by the project mentees
- With a view to widening the scope of Collective Action into the humanitarian sector, a case study with the [Philippines Disaster Resilience Foundation](#) on improving business integrity in disaster response and recovery is in preparation
- With the support of the Basel Institute, the [Global Platform for Sustainable Natural Rubber](#) is using its existing Collective Action model to improve business integrity in the natural rubber supply chain

- Establishing indicators that demonstrate opportunities for engaging in Collective Action at a country level has started in collaboration with a university partner

#### Impact

The project has widened the scope and broadened the reach of Collective Action in different regions and sectors through:

- Regional forums and awards, which have raised the profile of Collective Action in [Southern Africa](#) and [Asia-Pacific](#)
- A [mentoring programme](#), which has led to the development of a 'Community of Practice', comprised of organisations with a global reach
- Support for improving business integrity through dual-purpose initiatives in the humanitarian, natural rubber, and healthcare sectors

## DESCRIPTION OF INTEGRITY PARTNER

The **Foundation for the Global Compact** was established in 2006 and registered as a 501(c) (3) non-profit organization under New York State law. The Foundation is based on the principle that transparency, integrity and public-private collaboration is essential to finding lasting solutions to pressing global problems.

The Foundation supports the activities of the **United Nations Global Compact** including fundraising, outreach and engagement with business stakeholders. This is a policy and engagement platform for businesses that are committed to aligning their operations and strategies with the Global Compact's ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption.

Name of Integrity Partner:

## Foundation for the Global Compact

## PROJECT:

### Advancing Collective Action Against Corruption through Global Compact Local Networks

## COUNTRY OF IMPLEMENTATION:

Global with focus on Bangladesh, Brazil, Egypt<sup>1</sup>, India, Indonesia, Kenya, Malaysia, Mexico<sup>2</sup>, Thailand, and Ukraine<sup>3</sup>

<sup>1</sup> replaces Japan <sup>2</sup> replaces Argentina  
<sup>3</sup> replaces Italy

## DURATION:

3 years

## USD (MILLION):

4,00 M

## REGISTERED IN:

USA

The project titled Advancing Collective Action against Corruption through Global Compact Local Networks ("Project") aims to expand and build upon the activities under the Siemens Integrity Initiative Third Funding Round United Nations Global Compact project "Scaling up Anti-Corruption Collective Action within Global Compact Local Networks" by:

- advancing the adoption of the "Uniting against Corruption: A Playbook on Anti-Corruption Collective Action" as a global resource,
- enabling Global Compact Local Networks ("GCLNs") to initiate and facilitate local and regional Collective Action initiatives, and
- scaling UN Global Compact's engagement in public-private policy dialogue to bring the private sector voice to the global anti-corruption agenda

To this end, the Project will adopt a three-pronged approach:

1. transform the Collective Action Playbook into an e-learning course to increase the understanding and uptake of the Collective Action methodology,
2. support select GCLNs in developing and carrying out Collective Action initiatives and
3. strategically engage with governments and other relevant stakeholders on current global thematic focus areas to enhance public-private cooperation in the fight against corruption





#### PROJECT AT A GLANCE:

Advance the Collective Action Playbook, enable Global Compact Local Networks to initiate and facilitate Collective Action initiatives and scale the United Nations Global Compact's engagement in public-private policy dialogue to accelerate responsible business practices and create a cleaner business environment

#### KEY ACTIVITIES

(OCTOBER 2022 – SEPTEMBER 2023):

- Collective Action was embedded into the United Nations Global Compact key events and initiatives, featuring a Call-to-Action from Business to Governments on the 20th Anniversary of the United Nations Convention against Corruption (UNCAC) submitted at the [Conference of the States Parties to UNCAC](#), where the [Private Sector Forum](#) was held
- The [Collective Action eLearning tool](#) was launched on December 9, 2022 and consistently promoted alongside its [Collective Action Playbook](#) methodology at the main global fora. Likewise, significant contributions were made by Global Compact Network India to secure the

inclusion of anti-corruption and Collective Action in the [2023 B20 policy paper](#)

- The Global Compact Network Mexico project was launched at its [annual flagship event](#) attended by over 500 business leaders. Global Compact Networks Bangladesh and Thailand managed to build safe platforms enabling the discussion of corruption. Major provincial and national conferences also sensitized 980 participants across sectors in Bangladesh, Indonesia and Malaysia
- Strong partnerships were established with the public sector and other crucial stakeholders by all local networks to create synergies, including joint training programmes developed in Bangladesh, Indonesia and Malaysia. Global Compact Network Egypt further collaborated with the Anti-Corruption Authority to align actions with the [National Anti-Corruption Strategy](#)
- Efforts focused on SMEs in India, Malaysia, Kenya and Ukraine. While Global Compact Network Kenya designed a self-assessment toolkit and a compliance model to support SMEs operationalize the [Code of Ethics for Business and the Anti-Bribery Act](#), Global Compact Network India became the fiscal host of [Alliance for Integrity](#)
- The [Guide on Implementing and Monitoring Collective Action](#) was launched in Brazil, together with relevant publications on corrup-

tion risks in Malaysia and Thailand. E-courses were also released in Malaysia and Ukraine

- GCN Ukraine and the Ukraine Business Compact jointly hosted the [Ukraine Recovery Conference](#) in June 2023. This was preceded by a major event with 68 participants in attendance where the [Ukraine Business Compact 2023](#) was unveiled and gained endorsement from over 600 businesses from 42 countries and 21 primary economic sectors representing a market capitalization of over USD 5.2 trillion

#### Impact

- By promoting Collective Action in the [Call-to-Action](#) and at the main anti-corruption fora worldwide, the [United Nations Global Compact](#) has significantly contributed to the Collective Action approach becoming a norm
- Local networks have secured ownership, trust and partnerships across sectors, and some have cemented their leadership as voices of the private sector at national and international levels which further raises the profile of Collective Action e.g. Global Compact Network Brazil who now monitors the [OECD Anti-Bribery Convention](#) and is a member of the National Transparency Council, and Global Compact Network Ukraine, host of the [Ukraine Recovery Conference Business Compact](#) signed by 600 companies

## DESCRIPTION OF INTEGRITY PARTNER

The **International Anti-Corruption Academy** (IACA) is an international organization and post-secondary educational institution. At present, it is comprised of 77 State Parties and 4 international organizations.

It is the only international organization with a mandate focused solely on fighting corruption through education, research, cooperation, and technical assistance delivery.

IACA strives to complement the United Nations' work in the field of sustainable development, including through project implementation and provision of technical assistance, and to facilitate the implementation of the United Nations Convention Against Corruption (UNCAC).

Its activities benefit public and private sector professionals and practitioners, academics, media professionals, and civil society.

The Academy currently offers four master's degree programmes, various capacity-building trainings, and technical assistance.

IACA also creates platforms for dialogue and networking on anti-corruption issues.

Name of Integrity Partner:

## International Anti-Corruption Academy

## PROJECT:

### TEACH (Train and Educate Anti-Corruption Champions) to Fight Corruption

## COUNTRY OF IMPLEMENTATION:

Global with focus on Least Developed Countries and Emerging Markets

## DURATION:

3 years

## USD (MILLION):

2,17 M<sup>1</sup>

## REGISTERED IN:

Austria

IACA will train and educate participants in its master's programmes, Summer Academy trainings at IACA, and the Regional Summer Academy (RSA) programmes. Regional Alumni Conferences will be organised in parallel to the RSA in Latin America (Central and South America) and Asia (South and South-Eastern Asia), both regions with high potential for impact.

An innovative objective of this project is the design and implementation of the Collective Action Impact Centre, which will guide and mentor participants throughout the implementation of Collective Action initiatives in Least Developed Countries and Emerging Markets.

Finally, IACA will gather and systematize empirical evidence of Siemens funded projects' outcomes aimed towards developing a clean business environment and leveling the playing field. This evidence will include a learning and training toolkit for further replication and implementation.

Building upon IACA's institutional strengths, the rationale behind the project is to put theory and knowledge into practice with real impact, and to promote and harvest Collective Action initiatives driven and implemented by IACA Alumni.

#### PROJECT AT A GLANCE:

Through training, education, Collective Action and the promotion of alliances between champions, IACA contributes significantly to the global fight against corruption

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- The [2022 Anti-Corruption Collective Action Certificate program](#) concluded with 8 participants successfully completing their training and implementing Collective Action projects over 8 months, resulting in tangible outcomes in their respective countries
- The 2023 class of the [Anti-Corruption Collective Action Certificate](#) began activities in March 2023, with 11 students completing their modular stage and initiating projects in various fields
- IACA hosted its first [Regional Alumni Conference in Kuala Lumpur, Malaysia](#), in November 2022 bringing together alumni from East, South-East, and South Asia, with 35 participants from 10 countries attending. The second [Regional Alumni Conference Latin](#)

[America](#) convened 57 alumni from 11 Latin American countries, providing travel grants to 11 professionals from Least Developed Countries and Emerging Markets

- [Regional Summer Academies in Asia and Central and South America](#) in November 2022 and March 2023 attracted 54 and 70 participants, respectively, from multiple countries, with travel grants provided to 33 professionals from Least Developed Countries and Emerging Markets
- The [International Anti-Corruption Summer Academy](#) in June 2023 drew 56 participants from 26 countries, awarding scholarships to 13 professionals from Less Developed Countries and Emerging Markets
- The [Master in Anti-Corruption \(MACS\)](#) and [International Master in Anti-Corruption Compliance and Collective Action \(IMACC\)](#) 2022 programs initiated, supporting 10 professionals from Less Developed Countries and Emerging Markets
- MACS and IMACC 2023 classes, beginning in October 2023, will award 11 scholarships to candidates from Less Developed Countries and Emerging Markets

- 3 scholarship holders of the [Master in Anti-Corruption and Diplomacy \(MACD\)](#) 2021 program successfully defended their theses in June 2023, with the 2022 program also successfully implemented and 5 partial fee waiver scholarships awarded. 3 scholarships will be awarded for the 2023 MACD class starting in October 2023

#### Impact

- Through degree programmes, short courses and academies, enhanced knowledge and skills acquired by students and participants can be used in innovative ways to prevent and combat corruption to enable clean and stable business environments in their respective countries
- IACA's Collective Action rationale combines theory with practical tools for concrete initiatives. The inaugural Anti-Corruption Collective Action Certificate programme closed with 5 out of 8 Collective Action initiatives, having reported significant achievements in municipal management, investigative improvements, compliance standards, maritime sector corruption prevention, and promoting ethics in the public sector through women's collaborative efforts

## DESCRIPTION OF INTEGRITY PARTNER

The **Maritime Anti-Corruption Network (MACN)** is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

Established in 2011, MACN is comprised of companies within the main sectors of the maritime industry. With over 180 companies from the maritime industry represented, MACN members own or manage over 50 percent of the total global tonnage in the maritime industry.

Since its inception, MACN has become one of the preeminent examples of an industry led Collective Action network.

Name of Integrity Partner:

## Maritime Anti-Corruption Network (MACN)

## PROJECT:

### MACN Regional Expansion: Collective Action Against Maritime Corruption

COUNTRY OF IMPLEMENTATION: DURATION:

Regional with focus on Bangladesh, India and Pakistan

3 years

USD (MILLION):

2,00 M

REGISTERED IN:

Denmark

This project enables MACN to expand its Collective Action methodology to Pakistan and Bangladesh and deepens MACN's ongoing engagement in India.

The project will take lessons learned from MACN's most mature Collective Action in Nigeria, partly funded through the Siemens Integrity Initiative, and will build on a similar intervention logic. In Nigeria, MACN has shown how public-private roundtables and a dedicated Private Sector Anti-Corruption HelpDesk result in corruption challenges being resolved and empower the private sector to resist and report corruption.

Through this project, MACN will launch the same type of activities in India, and further localize capacity to drive Collective Action by the local maritime value chain and NGOs. MACN will partner with the United Nations Global Compact in Pakistan, Bangladesh, and India, to establish local Collective Action alliances in each country and deploy MACN's Collective Action tools and methodology.

Key national maritime associations, and the local maritime value chain, will be equipped with tools and resources to promote and implement Collective Action and provide support on anti-bribery practice to local business beyond the life of this project.

#### PROJECT AT A GLANCE:

Improve governance and efficiency of ports by promoting corruption prevention practices and Collective Action among local NGOs and across the local logistics value chain

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- More resources have been added to focus on Collective Action and the Helpdesk as part of an overall strategy to continue with and sustain the Collective Action projects
- [MACN engaged in the B20 India 2023 process](#) and contributed to the recommendations of the [Action Council on ESG in Business](#). MACN's proposal for anti-corruption measures to enable a robust and resilient supply chain network were incorporated in the [recommendations of the Indian B20](#) at the New Delhi Summit Meeting in August 2023
- The project engaged extensively with a wide array public and private sector stakeholders and has provided integrity training to 16 412 maritime professionals. 32 maritime companies have integrated the integrity module into their own training management systems
- Under the project activities and in line with MACN's digital initiatives, a Helpdesk in India was fully operationalized in July 2022 together with the relevant support tools and training materials and a functioning [MACN India Dashboard](#). In this reporting period:
  - 647 Pre-Arrival Notifications (PANs) covering 31 ports across India were filed
  - 18 reported maritime corruption demands were pro-actively escalated, followed up and resolved within no more than 4 hours of reporting and with a 100% success rate
- 3 major events were held in [Mumbai](#) (India), [Karachi](#) (Pakistan) and [Chittagong](#) (Bangladesh) with a total of over 450 maritime industry participants in attendance
- The project constituted a Collective Action advisory group in March 2023 with senior representatives from Public and Private Associations who aim to meet quarterly to consider industry feedback and provide guidance. Furthermore, the collaboration with and the distribution of training material to key national industry associations enables these associations to act as Collective Action hubs in the future and strengthens local ownership
- Training modules for the 'Next Generation of Seafarers' are in development and initial steps in the development of training for government officials are underway

#### Impact

- Through the establishment of Collective Action alliances, the maritime industry has taken important steps toward better preventing and rejecting corruption in India, Bangladesh, and Pakistan
- In Bangladesh and Pakistan, the projects have enabled government entities to work together to tackle the challenges and the local private sector is now empowered to address corruption challenges in a transparent manner
- In India the establishment of a HelpDesk has been instrumental in solving cases in real time and the aim is to build in this success as an inspiration to the other project countries
- Increased industry and public sector participation and collaboration will continue to contribute to resilience against corruption in the maritime sector as well as sustainable future Collective Action momentum driven by MACN. This will translate into a more efficient and robust maritime sector which in turn will ultimately enable better conditions for clean business to the benefit of all

## DESCRIPTION OF INTEGRITY PARTNER

The **Organisation for Economic Co-operation and Development** (OECD) is an international organisation that works to build better policies for better lives.

Our goal is to shape policies that foster prosperity, equality, opportunity and well-being for all.

We draw on almost 60 years of experience and insights to better prepare the world of tomorrow.

Together with governments, policy makers and citizens, we work on establishing international norms and finding evidence-based solutions to a range of social, economic and environmental challenges.

Name of Integrity Partner:

## Organisation for Economic Co-operation and Development

## PROJECT:

### Fair Market Conditions for Competitiveness in six OECD partner countries

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Algeria, Croatia, Saudi Arabia, Serbia, South Africa, and Uzbekistan	3 years	3,00 M	France

This project intends to support the creation of a level-playing field and fair market conditions in the six target countries in order to enhance competitiveness and integrity in a sustainable and inclusive way. It is designed to build on the experience and demonstrated impact of the project to create fairer market conditions in the Adriatic region, funded by the Third Funding Round of the Siemens Integrity Initiative.

Although this group of countries is very heterogeneous with varying institutional capacities, unique legal and regulatory frameworks and distinct policy priorities, they suffer from significant levels of corruption, a lack of transparency, and anti-competitive behavior. Addressing the most pressing issues and underlying constraints in each country in a joint effort by engaging with government officials, business representatives, civil society and academia, will allow building mutual trust and reinforcing processes towards fairer practices in the economy and society.

This project will address country-specific drawbacks by promoting international standards, exchanging best practices, increasing capacities and empowering stakeholders. More specifically, through this project the OECD seeks to:

- Raise awareness about effective practices to fight corruption across the economy and society;
- Intensify the policy discussion involving the public;
- Provide tailor-made advice and hands-on recommendations;
- Translate policy guidance into concrete reform actions;
- Integrate the latest knowledge and approaches into academic curricula;
- Strengthen institutional capacities, inter-ministerial cooperation and stakeholder consultations.

#### PROJECT AT A GLANCE:

The goal is to help create fair market conditions in target countries by promoting OECD standards via a Collective Action community and by supporting the design and implementation of actionable policy recommendations. In turn, it is anticipated to support economic growth and employment creation in the beneficiary countries

#### KEY ACTIVITIES

(OCTOBER 2022 – SEPTEMBER 2023):

##### *Horizontal Work*

- Project coordination and stakeholder engagement continued with project activities and results being presented at various events like “Promoting business integrity through European Investment Bank (EIB) exclusions and settlements” and “[Summit for Democracy](#)” and being maintained on the [project webpage](#) or shared through other communication channels like “[OECD Global](#)” and like “[MKseeurope](#)”

##### *Algeria*

- Corruption risks were mapped in three key economic sectors and discussed with stakeholders

- The Collective Action Community was trained through the roundtable and the participation in a workshop on HLRM and a [workshop with tertiary institutions](#)

- Anti-corruption curricula were promoted among academia

##### *Croatia*

- Capacity was built for anti-corruption reforms through Collective Action meetings and workshops with high level government officials, compliance officers and business representatives

- Anti-corruption curricula were promoted among academia

##### *Saudi Arabia*

- Discussions were held with the [Oversight and Anti-Corruption Authority](#) and senior public officials on accelerating implementation
- Background materials for the first round of activities were finalised and are ready for implementation

##### *Serbia*

- Capacity was built for anti-corruption reforms through Collective Action meetings and workshops with high level government officials, compliance officers and business representatives

- Anti-corruption curricula were promoted among academia

##### *South Africa*

- Corruption risks were mapped and discussed with stakeholders in two key economic sectors
- A technical seminar on integrity in the state-owned sector was organised
- Anti-corruption curricula were promoted among academia

##### *Uzbekistan*

- Awareness was raised on the project through a meeting with the Collective Action Community
- Capacity on public procurement was built via tailored workshops

#### Impact

- During the third project year and building on the stakeholder mobilisation, the team substantially strengthened stakeholder capacity in numerous workshops and training sessions along with targeted OECD expert events
- Several thematic workstreams were launched in which tailored country analysis and advice is incrementally being developed



## DESCRIPTION OF INTEGRITY PARTNER

**Transparency International** is a global Movement with over 100 chapters around the world dedicated to a vision of a world free of corruption.

The TI Secretariat (TI-S), based in Berlin, is an independent not-for-profit organization with over 25 years of experience working to promote transparency, accountability and integrity at all levels and sectors of society.

TI-S tackles corruption on the regional and global stage by supporting national chapters and coordinating the Movement's international initiatives that seek to hold power to account for the common good.

In collaboration with chapters and contact groups, the Secretariat produces numerous research tools, policy positions, and advocacy strategies.

It serves as a knowledge center, offering valuable insights and new approaches to fighting corruption through research, advocacy, and coalition building.

Name of Integrity Partner:

# Transparency International e.V.

## PROJECT:

## Bolstering Integrity in Public Contracting: A Reinvigorated Approach and Coalition on Integrity Pacts

COUNTRY OF IMPLEMENTATION:	DURATION:	USD (MILLION):	REGISTERED IN:
Global with focus on Argentina, Romania, and Spain	3 years	1,00 M	Germany

Transparency International aims to address corruption in public procurement by reinvigorating the Integrity Pact as an anti-corruption standard and expanding global and national coalitions promoting its adoption in critical investments and regulation. The initiative will:

1. Reframe and strengthen the Integrity Pact as a global anti-corruption standard by developing an updated global narrative. This will ease its understanding among broader audiences and provide a clear reference for consistent adoption while leaving space for national adaptation.

2. Widen the number of policy and business leaders who promote the application and implementation of the Integrity Pact as an anti-corruption standard through global advocacy.

3. Embed the Integrity Pact standard in key contracting projects or regulation in three countries.

Working at the national level, TI chapters in Argentina, Romania and Spain will build cases for the adoption of the IP anti-corruption standard and its integration into public contracting regulation and convince government leaders to commit to its implementation in flagship public investments or formal adoption.



#### PROJECT AT A GLANCE:

To reinvigorate the Integrity Pact as an anti-corruption golden standard and expand global and national coalitions promoting its adoption in critical investments and regulation

#### KEY ACTIVITIES

(OCTOBER 2022 – SEPTEMBER 2023):

- Carried out an extensive consultation process for the development of the global Integrity Pact standard, involving over 20 TI Chapters and partner organisations. This included the elaboration and review of a working paper, a [workshop at the International Anti-Corruption Conference 2022](#), interviews with policy experts and webinars to validate the new narrative within the TI Movement
- Developed the global advocacy plan “Integrity Pacts for Sustainable Development” aimed at creating a multi-stakeholder coalition to promote the application of the Integrity Pact in contracting projects related to the Sustainable Development Goals
- Carried out [training](#) coordinated by the European Institute of Public Administration and sponsored by the European Union Commission on Integrity Pact implementation for over 40 representatives from European Union authorities responsible for managing European Union funds across 15 European Union countries
- Contributed to the development of a [policy paper](#) and [webinar](#) for integrity in climate action related procurement projects in collaboration with the Green Climate Fund, including recommendations for the application of Integrity Pacts
- Transparency International Chapters in [Argentina](#), [Romania](#) and [Spain](#) published three national policy papers on trends and challenges in public contracting integrity. The papers were presented in national events in [Argentina](#) and [Romania](#)
- Transparency International Romania, in collaboration with authorities managing EU funds in Romania, began the process of implementation of an Integrity Pact to monitor a high value procurement project involving the auction of naval transportation services in the Danube Delta region. The initiative, initiated in large part thanks to advocacy carried out in this project, will include relevant business integrity and social inclusion activities, in line with the global Integrity Pact standard currently under development

#### Impact

- Significant progress has been made in the development of a renewed narrative for the Integrity Pact as a standard for Collective Action in public contracting which is recognised by a broad community of policy experts and civil society organisations
- Support for Integrity Pact implementation in the European Union has been consolidated and expanded at both regional and national levels. This has led to the initiation of an Integrity Pact in Romania which will allow piloting the global Integrity Pact standard and setting a precedent for its mainstreaming

## DESCRIPTION OF INTEGRITY PARTNER

The mission of the **United Nations Office on Drugs and Crime** (UNODC) is to contribute to global peace and security, human rights and development by making the world safer from drugs, crime, corruption and terrorism and by working for and with Member States to promote justice and the rule of law to build resilient societies.

The important and complementary mandates of UNODC are:

- serving as the guardian of international treaties and the secretariat to global policymaking bodies;
- providing strong research and policy analysis; and
- combining global expertise and a wide field presence to provide specialized assistance to Member States.

Name of Integrity Partner:

## United Nations Office on Drugs and Crime (UNODC)

## PROJECT:

### Global Action for Business Integrity

## COUNTRY OF IMPLEMENTATION: DURATION:

Global with focus on Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia, Uzbekistan, Ukraine and 1 global outreach component

3 years

## USD (MILLION):

4,50 M<sup>1</sup>

## REGISTERED IN:

Austria

Despite progress in recent years, corruption remains a key impediment to sustainable development. Corruption imposes high costs on doing business, it deters investment and stifles competition. The COVID-19 pandemic intensified the challenges to business integrity by disrupting supply chains and producing rapid shifts in corruption risks for many companies.

As a response, Collective Action by the public sector, the private sector, civil society and academia is needed to develop innovative and sustainable solutions to prevent and counter corruption.

The UNODC project Global Action for Business Integrity aims to support this process and to reduce corruption by strengthening legal frameworks, public-private dialogue and private sector capacity to enhance integrity in accordance with the relevant provisions of the [United Nations Convention against Corruption \(UNCAC\)](#).

The project is active in seven target countries: Brazil, Colombia, Egypt, Ethiopia, Malaysia, Saudi Arabia and Uzbekistan.

In addition, the project's global component will play a critical role in upscaling effective approaches, achieving sustainability and mainstreaming the good practices identified under this project into global policy forums.

#### PROJECT AT A GLANCE:

To reduce corruption by strengthening legal frameworks, public-private dialogue and private sector capacity to enhance integrity

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- In Brazil, [publications](#) were launched to increase public and private entities' knowledge on the legal framework and good practices for preventing and countering corruption in the bidding process
- In Colombia, ten workshops were held across the country with representatives from academia and civil society to assess their challenges to participating in anti-corruption efforts and to develop solutions
- In Egypt, the contextualized training modules on integrity and business ethics for senior students in public and private universities was finalized. 27 lecturers from 13 faculties in 9 private and public universities from

7 different governorates across Egypt were trained to teach the module. 30 students will be trained from each university leading to the training of 270 students

- In Ethiopia, an inclusive dialogue session was conducted with 126 participants from government, private sector, civil society and academia to deliberate on business integrity in the country
- In Malaysia, a [roundtable discussion](#) with 80 representatives from criminal justice institutions was held to discuss a draft publication on the liability of legal persons in Malaysia, develop additional recommendations and review other countries' experience and good practices
- In Saudi Arabia, a revised work plan was developed to focus on priorities that will strengthen business integrity in public procurement
- In Uzbekistan, over 150 specialists were trained to perform anti-corruption screening of legal acts

- As a spill-over into Mexico, a [Coding4Integrity hackathon](#) was held to involve youth in solving business integrity challenges in the health sector

#### Impact

- Increased knowledge and awareness by public and private sector stakeholders of the [United Nations Convention against Corruption \(UNCAC\)](#), national legal frameworks and good practices to strengthen business integrity
- Increased interactions and dialogue between the public and private sectors on anti-corruption and business integrity
- [Collective Action has been strengthened](#) by including other key stakeholders such as academia, civil society and youth in efforts to strengthen business integrity

## DESCRIPTION OF INTEGRITY PARTNER

**WU** (Vienna University of Economics and Business) is Europe's largest Business and Economics University offering degree programs as well as a wide range of specialization areas and research opportunities. Project responsibility will be undertaken by the Institute for Austrian and International Tax Law.

The Institute for Austrian and International Tax Law is one of the world's largest academic institutions engaged in the research and teaching of the tax law. The Institute has a longstanding tradition in organising international conferences and trainings both for practitioners and tax administrations.

Name of Integrity Partner:

## Wirtschaftsuniversität Wien (Vienna University of Economics and Business)

## PROJECT:

### Good governance in a digital and open trading environment

COUNTRY OF IMPLEMENTATION: DURATION:

Regional with focus on  
Ghana, Kenya, Nigeria,  
Rwanda, South Africa,  
Uganda, Zambia, and selected  
Belt and Road Initiative

3 years

USD (MILLION):

1,00 M

REGISTERED IN:

Austria

New digital technologies have transformed the way that African citizens work, live and play and the way they interact with their governments. New opportunities for inter-African trade are opening up with the African Continental Free Trade Area Agreement (AfCFTA).

With a young digital savvy population and a rapidly expanding digital infrastructure, Africa is well placed for this transformation. Nevertheless, new technologies and open borders carry the risk of facilitating Illicit Financial Flows (IFFs).

This project focuses on how African countries can minimize the risk and maximize the benefits from this more open and technologically sophisticated environment.

To achieve this transformation will require the active participation of civil society organizations (CSOs). It will require that Financial Intelligence Units (FIUs), Tax and Customs Departments, Trade Ministries, Anti-Corruption Authorities, Justice and Finance Ministries and other relevant institutions all seamlessly cooperate and engage in information exchange.

Achieving more effective actions against corruption and other forms of illicit financial flows will require action on all three aspects of this project: exploring how digital technologies can improve the response of law enforcement bodies; ensuring the interests of these bodies are taken into account as the African Trade Agreement is implemented and engaging CSOs in this debate.

#### PROJECT AT A GLANCE:

Adapt approaches of regulatory and tax agencies cooperation to counter tax and financial crimes in a digital and free trade environment and strengthening Civil Society Organizations' engagement in the policy debate

#### KEY ACTIVITIES (OCTOBER 2022 – SEPTEMBER 2023):

- The progress on the development of the roadmap to digitalization of revenue authorities was presented to the [United Nations Tax Committee](#) in March 2023 and to the [Belt and Road Initiative Tax Administration Mechanism](#) in June 2023, with suggestions for future work on illicit financial flows
- [Wirtschaftsuniversität Wien](#) and the [African Tax Administration Forum](#) co-hosted a webinar on February 9, 2023 on practical aspects of the implementation of free trade agreements among selected regional communities, with over 100 participants in attendance
- [Wirtschaftsuniversität Wien](#) and the African Tax Administration Forum published a [joint](#)

[policy brief](#) on the overlaps between trade and investment obligations and tax measures in March 2023

- 2 Focus Group meetings were convened:
  - The first was in November 2022 on inter-agency cooperation and technology with over 60 participants from 25 African countries
  - The second was in September 2023 on technology and illicit financial flows with about 90 participants representing African financial intelligence units, tax administrations and other law enforcement agencies as well as private sector representatives. The discussions included the use of technology to support a risk-based approach to combating illicit financial flows and tax crimes
- The Summer School in February 2023 under the theme "[Enhancing the Capacity of Civil Society Organizations in Efforts to Curb Illicit Financial Flows](#)" was co-hosted by Wirtschaftsuniversität Wien, [Tax Justice Network Africa](#), [United Nations Office on Drugs and Crime](#), [World Bank](#), [University of Pretoria](#) and [Oxfam](#) with European Union representatives in attendance and 45 participants from 20 countries. The [Tax Justice Network Africa Academy](#) will take this dialogue forward with WU Wien

#### Impact

- The combination of the July conference, the Focus Group meetings, the signing of MOUs with the [African Tax Administration Forum](#) (ATAF) and the [Tax Justice Network Africa](#) (TJNA), the engagement with the African Union, the [United Nations Conference on Trade and Development](#) (UNCTAD), the [United Nations Tax Committee](#) and the engagement with the business and academic communities in Africa has enabled the project to influence the political agenda on illicit financial flows in the continent
- Peer learning between the focus countries has led to institutional changes such as the creation of high net-worth individual units within tax administrations
- The focus countries have moved towards a more strategic whole of government approach to countering illicit financial flows, while the case studies in the use of technology has identified best practices

# D1.

• Annex –  
Additional Siemens Reports

## Annex – Additional Siemens Reports



### Siemens Report for fiscal 2023

Siemens has published the [Siemens Report for the fiscal year 2023](#). It provides detailed information about the business development of the company, its earnings, assets, and finances.

# Sustainability report 2023



**SIEMENS**

## Siemens Sustainability Report 2023

The [Sustainability Report 2023](#) provides on 167 pages a wealth of information about Siemens and its activities and includes:

1. Siemens at a glance and our DEGREE framework
2. Our sustainability management
3. Governance – responsible business practices
4. Environment – preserving nature and resources
5. Social – Contribution to people and society
6. Our sustainability indicators
7. Annex



More information on Collective Action is available on [www.siemens.com/collective-action](http://www.siemens.com/collective-action)

In addition to this report, Siemens publishes information on its activities in its comprehensive Annual Report at the end of the fiscal year.

This Siemens Integrity Initiative Annual Report 2023 has been compiled to the best of our knowledge and includes information that has been submitted to the Siemens Integrity Initiative Project Office through March 01, 2024.

Information provided in Section C is created and approved for external use by each Integrity Partner.

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#### **About Siemens**

**Siemens AG** (Berlin and Munich) is a leading technology company focused on industry, infrastructure, transport, and healthcare. From more resource-efficient factories, resilient supply chains, and smarter buildings and grids, to cleaner and more comfortable transportation as well as advanced healthcare, the company creates technology with purpose adding real value for customers. By combining the real and the digital worlds, Siemens empowers its customers to transform their industries and markets, helping them to transform the everyday for billions of people. Siemens also owns a majority stake in the publicly listed company Siemens Healthineers, a globally leading medical technology provider shaping the future of healthcare. In fiscal 2023, which ended on September 30, 2023, the Siemens Group generated revenue of €77.8 billion and net income of €8.5 billion. As of September 30, 2023, the company employed around 320,000 people worldwide.

Further information is available on the Internet at [www.siemens.com](http://www.siemens.com).

